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July 1, 2014

Via Hand Delivery

Ms. Marlene Dortch Federal Communications Commission 445 12th Street SW Washington, D.C. 20554

Re:

FCC Form 481 - High-Cost Support Information and Low-Income Support Information

Pursuant to 47 C.F.R. §§ 54.313(a)-(g) and 54.422(a)

Dear Secretary Dortch:

Pursuant to 47 C.F.R. §§ 54.313(a)-(g) and 54.422(a) of the Federal Communication Commission's regulations, please find enclosed the FCC Form 481 for Copper Valley Telephone Cooperative, Inc. This form was also filed at the Regulatory Commission of Alaska (RCA) and USAC.

Copper Valley Telephone Cooperative, Inc. seeks confidential treatment for its financial information pursuant to the Protective Order, Connect America Fund, et al., WC Docket No. 10-90 et al., (Nov. 16, 2012). A redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under 47 C.F.R. §§ 0.457 and 0.459 of the initial § 54.202(a) Five-Year Service Quality Improvement Plan.

Please do not hesitate to contact me if you have any questions or I may be of any assistance.

Sincerely,

DYKEMA GOSSETTPLLC

Shannon M. Heim

4000 Wells Fargo Center 90 South Seventh Street

Minneapolis, MN 55402

Phone (612) 486-1586 Fax: (855) 223-7059

Email: sheim@dykema.com

SMHE/ebl

REDACTED - FOR PUBLIC INSPECTION



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July 1, 2014

Via Hand Delivery

Ms. Marlene Dortch, Secretary Federal Communications Commission 445 12th Street SW Washington, D.C. 20554

Re: FCC Form 481 - High-Cost Support Information and Low-Income Support Information Pursuant to 47 C.F.R. §§ 54.313(a)-(g) and 54.422(a)

Dear Ms. Dortch:

Pursuant to the Protective Order in Connect America Fund, et al., WC Docket No. 10-90 et al. (Nov. 16, 2012) and 47 C.F.R. §§ 0.457 and 0.459, Copper Valley Telephone Cooperative, Inc., by its attorneys, hereby requests that certain materials and information be withheld from public inspection. Specifically, Copper Valley Telephone Cooperative, Inc. request confidential treatment of the Five-Year Service Quality Improvement Plan (the "Plan") attached to its Form 481 filing.

In support of its request for confidential treatment and pursuant to the requirements under 47 C.F.R. § 0.459(b), Copper Valley Telephone Cooperative, Inc. states the following:

1. Identification of the specific information for which confidential treatment is sought.

Copper Valley Telephone Cooperative, Inc. seeks confidential treatment of the Plan attached to the Form 481 filing accompanying this letter. The Plan contains sensitive financial information about Copper Valley Telephone Cooperative, Inc. as well as information about Copper Valley Telephone Cooperative, Inc.'s projected network improvements and upgrades for voice and broadband services during the period from 2015 through 2019.

2. Identification of the Commission proceeding in which the information was submitted or description of the circumstances giving rise to the submission.

The documents are being submitted as part of the annual Eligible Telecommunications Carrier ("ETC") Report (Form 481) mandated by 47 C.F.R. § 54.313.

## Dykema

Ms. Marlene Dortch, Secretary July 1, 2014 Page 2

3. Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.

The data described is highly confidential and sensitive commercial and financial information which constitutes trade secrets or sensitive commercial and financial information that would "customarily be guarded from competitors" and is therefore exempted from mandatory disclosure under FOIA Exemption 4 and 47 C.F.R. § 0.457(d).<sup>2</sup>

4. Explanation of the degree to which the information concerns a service that is subject to competition.

The Plan relates to voice and broadband services provided by Copper Valley Telephone Cooperative, Inc. that are subject to competition from competitive local exchange carriers, cable television system operators, electric power utilities, fixed and mobile wireless service providers, and/or satellite carriers.

Specifically, the Plan sets forth in detail the services provided by Copper Valley Telephone Cooperative, Inc. over its existing network including location of customers, as well as planned network improvement and maintenance for 2015 through 2019, including project dates, populations impacted by the improvements and upgrades, and projected capital costs associated with maintaining the network. This information is competitively sensitive information related to the company's existing network and planned upgrades and maintenance, and would benefit Copper Valley Telephone Cooperative, Inc.'s competitors if they were able to have access to this information.

5. Explanation of how disclosure of the information could result in substantial competitive harm.

Disclosure of the Plan is likely to result in substantial competitive harm to Copper Valley Telephone Cooperative, Inc. because the Plan could provide competitors with commercially sensitive insights related to Copper Valley Telephone Cooperative, Inc.'s operations, service offerings, and costs.

6. Identification of any measures taken by the submitting party to prevent unauthorized disclosure.

Copper Valley Telephone Cooperative, Inc. does not make the Plan or any of the information contained therein publically available in any way. The Plan is only made available to

<sup>&</sup>lt;sup>1</sup> 47 C.F.R. § 0.457(d)(2).

<sup>&</sup>lt;sup>2</sup> 5 U.S.C. § 522(b)(4).

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Ms. Marlene Dortch, Secretary July 1, 2014 Page 3

key employees with a direct need-to-know basis. This production has been completed by outside counsel.

7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.

Copper Valley Telephone Cooperative, Inc. does not make the Plan available to the public and it has not previously allowed disclosure of the Plan to third parties that are not otherwise bound by confidentiality obligations.

8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.

The Plan should be treated as confidential for an indefinite period, as Copper Valley Telephone Cooperative, Inc. will always be subject to competition and the competitive harms associated with the disclosure of the Plan.

9. Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted.

None.

In order to provide adequate protection from public disclosure, Copper Valley Telephone Cooperative, Inc. requests that the Commission strictly limit distribution of the Plan within the Commission on a "need to know" basis and not allow any distribution outside of the Commission. In the event that any person or entity outside of the Commission requests disclosure of the Plan, Copper Valley Telephone Cooperative, Inc. requests that it be so notified immediately so that it can oppose such request or take other action to safeguard its interests as it deems necessary and appropriate.

Please do not hesitate to contact me if you have any questions or I may be of any assistance.

Sincerely,

DYKEMA GOSSETT PLLC

Shannon M. Heim

SMHE/ebl



P.O. Box 337, Valdez, AK 99586 907-835-2231

June 25, 2014

**Electronic Filing** 

Ms. Marlene H. Dortch Office of Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re:

WC Docket No. 10-90 & 11-42

Annual §54.313/54.422 Report of High-Cost and Low Income Recipient, Form 481

Dear Ms. Dortch:

Enclosed herein is the annual report for Copper Valley Telephone Cooperativa, Inc., Study Area Code 613006 pursuant to §54.313/54.422 of the Commission's rules.

Please contact me with any questions at:

Hame R Mushy

Phone: 907-835-2231 Email: pmurphy@cvtc.org

Sincerely,

Pamla R. Murphy

Chief Financial Officer

Attachment

Copies to:

Universal Service Administrative Company **Electronic Filing** Washington, DC 20036

Alaska Regulatory Commission **Electronic Filing** 

FCC For	m 481 - Carrier Annual Reporting Data Collection Form	FCC Form 483 OM 8 Control No July 2013	o. 3060-0986/OMB Combol No. 3060-0819
<010>	Study Area Code	3006	
<015>	Study Area Name	OPPER VALLEY TEL	
<020>	Program Year	15	
<030>	Contact Name: Person USAC should contact with questions about this data	upla R. Murphy	
<035>	Contact Telephone Number: Number of the person identified in data line <030>	078352231 ext.772)	
<039>	Contact Email Address: Email of the person identified in data line <030>	wrphy@cvtc.org	
			54.313 54.422
ANNUA	L REPORTING FOR ALL CARRIERS		Completion Completion Required Required
Section of			(check box when complete)
<100>	Service Quality Improvement Reporting	(complete attached worksheet)	, Maria
	Outage Reporting (voice)	(complete attached worksheet)	
<210>	Unfulfilled Service Requests (vaice)	tages to report	· (11111)
<300>	Unfulfilled Service Requests (voice) 0		
<310>	Detail on Attempts (voice)		THEFT.
		(ottock decen	ptive document)
		Junior Besty	plive volumenty
<320>	Unfulfilled Service Requests (broadband)		· 111111
555711			- Itaanaa
<330>	Detail on Attempts (broadband)		211111
		(attach desc	riptive document)
<400>	Number of Complaints per 1,000 customers (voice)		
<410>	Fixed		v
<420>	Mobile 0,0		
<440>	Number of Complaints per 1,000 customers (broad	<u>d)</u>	× (11111)
<450>	Mobile 0.0	-	
<500>	Service Quality Standards & Consumer Protection F	s Compliance (check to indicate certification)	V
	613006ak510.pdf		
<510>		(ottached descriptive document)	✓
con			
<600>	Functionality In Emergency Situations 613006ak610.pdf	(check to Indicate certification)	
		(attached descriptive document)	V
-640-			
<610>			- Leaven
<700>	Company Price Offerings (voice)	(complete attached worksheet)	0 011111
<710>	Company Price Offerings (broadband)	(complete attached worksheet)	V V
<800>	Operating Companies and Affillates Tribal Land Offerings (Y/N)?	(if yes, complete attached worksheet)	· 111111
	Voice Services Rate Comparability	(check to indicate certification)	· [1111]
<1010>		(attach descriptive document)	227272
<1010>			2,555,55
<1100>	Terrestrial Backhaul (Y/N)?	(if not, check to indicate certification)	411111
	The second of th	10 may amon to manage on the grad.	(11111111
<1110>	Terms and Condition for Lifeline Customers	(complete attached worksheet) (complete attached worksheet)	
\120U>	Price Cap Carriers, Proceed to Price Cap Additional		22232
	Including Rate-of-Return Carriers affiliated with Pi	AND CONTRACTOR OF THE PROPERTY	1144
<2000>	messarily mere-of-research entries off motor with th	(check to indicate certification)	411111
<2005>		(complete attached worksheet)	
	Rate of Return Carriers, Proceed to ROR Additiona	cumentation Worksheet  - FOR PUBLIC INSPECTATION	V (1999)
<3000>			

	ervice Quality Improvement Reporting Ilection Form			FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	613006		
<015>	Study Area Name	COPPER VALLEY	TEL	
<020>	Program Year	2015		
<030>	Contact Name - Person USAC should contact regarding this data	Pamla R. Murph		
<035>	Contact Telephone Number - Number of person identified in data line <030>	9078352231 ext	t.7721	
<039>	Contact Email Address - Email Address of person identified in data line <030>	pmurphy@cvtc.	org	
<110>	Has your company received its ETC certification from the FCC?	(yes /	no) O •	
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes /	no) O O	
<112>	report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.  Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your of CETC which only receives frozen support, your progress report is only required to address voice telephony service.	company is a	613006ak112.pdf	
	Please check these boxes below to confirm that the attached documents(s), on li 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.	ine		Name of Attached Document
<113>	Maps detailing progress towards meeting plan targets			
<114>	Report how much universal service (USF) support was received	~	· -	
<115>	How (USF) was used to improve service quality			
<116>	How (USF)was used to improve service coverage			
<117>	How (USF) was used to improve service capacity			
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.			

(200) Service Outage Reporting (Voice)

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	613006
<015>	Study Area Name	COPPER VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Pamla R. Murphy
<035>	Contact Telephone Number - Number of person identified in data line <030>	9078352231 ext.7721
<039>	Contact Email Address - Email Address of person identified in data line <030>	_pmurphy@cvtc.org

<220>

<9>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<c1></c1>	<c2></c2>	<d></d>	<e></e>	<f></f>	<g></g>	<h>&gt;</h>
NORS Reference Number	Outage Start Date	Outage Start Time	Outage End Date	Outage End Time	Number of Customers Affected	Total Number of Customers	911 Facilities Affected (Yes / No)	Service Outage Description (Check all that apply)	Did This Outage Affect Multiple Study Areas (Yes / No)	Service Outage Resolution	Preventative Procedures
_											

FCC Form 481
OM8 Control No. 3060-0986/OM8 Control No. 3060-0819 July 2013

<010>	Study Area Code	\$13006
<015>	Study Area Name	COFPER VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Samia R. Murphy
<035>	Contact Telephone Number - Number of person identified in data line <030>	9076352231 ext. 7721
<039>	Contact Email Address - Email Address of person identified in data line <030>	pmurphylovic.org

<701> Residential Local Service Charge Effective Date
<702> Single State-wide Residential Local Service Charge
13.45

<703>

<a1></a1>	<82>	<a3></a3>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<b5></b5>	<0>
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fe
		1						-
		-						
								-
		1						-
		1		See a	tached worksheet		<u> </u>	-
							1	
							i e	
	1							-

(710) Broadband Price Offerings	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	613006
<015>	Study Area Name	COPPER VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Pamla R. Murphy
<035>	Contact Telephone Number - Number of person identified in data line <030>	9078352231 ext.7721
<039>	Contact Email Address - Email Address of person identified in data line <030>	pmurphy@evtc.org

11>	<a>&gt;</a>	<92>	<b1></b1>	<b2></b2>	<c></c>	<d1></d1>	<d2></d2>	<d3></d3>	<d4></d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rate and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached (select
-									
-									
				<ul> <li>See attac worksheet -</li> </ul>	hed				
_									

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code		613006	
<015>	Study Area Name		COPPER VALLEY TEL	
<020>	Program Year		2015	
<030>	Contact Name - Person	USAC should contact regarding this data	Pamla R. Murphy	
<035>	Contact Telephone Nun	nber - Number of person identified in data line <030>	9079352231 ext.7721	
<039>	Contact Email Address -	Email Address of person identified in data line <030>	pmurphy@evtc.org	
<810>	Reporting Carrier	Copper Valley Telephone Cospetative, Inc.		
<811>	Holding Company	Copper Valley Telephone Cooperative, Inc.		
<812>	Operating Company	Copper Valley Telephone Scoperative, Inc.		

<a1></a1>	<a2></a2>	<a3></a3>
Affiliates	SAC	Doing Business As Company or Brand Designation
	See attached worksheet	

(900) Tribal Lands Reporting FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 **Data Collection Form** July 2013 <010> Study Area Code 613006 <015> Study Area Name COPPER VALLEY TEL < 020> Program Year 2015 <030> Contact Name - Person USAC should contact regarding this data Pamla R. Murphy 9078352231 ext.7721 <035> Contact Telephone Number - Number of person identified in data line <030> Contact Email Address - Email Address of person identified in data line <030> < 039> pmurphy@cvtc.org Copper Valley Telephone Cooperative, Inc.'s entire area in Alaska Tribal Land. Individual village councils are Cheesh'na Village Council, Chitina Village Council, Gakona Village Council, Gulkana Village Council, Kluti <910> Tribal Land(s) on which ETC Serves -Kaah Village, Mentasta Traditional Council, Tatitlek Village Council, and Tatlina Village. 613006ak920.pdf <920> Tribal Government Engagement Obligation Name of Attached Document If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920,

demonstrates coordination with the Tribal government pursuant to \$ 54.313(a)(9) includes:

<921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
<922> Feasibility and sustainability planning;
<923> Marketing services in a culturally sensitive manner;
<924> Compliance with Rights of way processes
<925> Compliance with Land Use permitting requirements
<926> Compliance with Facilities Siting rules

Compliance with Environmental Review processes

Compliance with Cultural Preservation review processes

Compliance with Tribal Business and Licensing requirements.

<927>

<928> <929>

(1100) No Terrestrial Backhaul Reporting		TO SHANNEY WE SEE	FCC Form 481
Data Coll	ection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	613006	
<015>	Study Area Name	COPPER VALLEY TEL	
<020>	Program Year	2015	
<030>	Contact Name - Person USAC should contact regarding this data	Pamla R. Murphy	
<035>	Contact Telephone Number - Number of person identified in data line <030	> 9078352231 ext.7721	
<039>	Contact Email Address - Email Address of person identified in data line <030	> pmurphy@cvtc.org	
<1120>	Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G)		
<1130>	Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G)		

Lifeline	ection Form	FCC Form 481  OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	613006
<015>	Study Area Name	COPPER VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Pamla R. Murphy
<035>	Contact Telephone Number - Number of person identified in data line <030>	9078352231 ext.7721
<039>	Contact Email Address - Email Address of person identified in data line <030>	pmurphy@cvtc.org
<1210>	Terms & Conditions of Voice Telephony Lifeline Plans	Name of Attached Document
<1220>	Link to Public Website HTTP b	http://www.cvinternet.net/Pages/Residential/TelephoneLifeline.php
or the we	heck these boxes below to confirm that the attached document(s), on line 1210, ebsite listed, on line 1220, contains the required information pursuant to (a)(2) annual reporting for ETCs receiving low-income support, carriers must report:	
<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	
<1222>	Details on the number of minutes provided as part of the plan,	
<1223>	Additional charges for toll calls, and rates for each such plan.	

0.,	ice Cap Carrier Additional Documentation	THE PROPERTY.		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-08
Including	Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers	Lall Market		July 2013
<010>	Study Area Code	613006		
<015>	Study Area Name	COPPER VALLEY TEL		
<020>	Program Year	2015		
<030>	Contact Name - Person USAC should contact regarding this data	Pamla R. Murphy		
<035>	Contact Telephone Number - Number of person identified in data line <030>	9078352231 ext.7721		
<039>	Contact Email Address - Email Address of person identified in data line <030>	pmurphy@cvtc.ord		
CHECK to	he boxes below to note compliance as a recipient of Incremental Connect Ameri	ica Phase I support, frozen High Cost supp	ort. High Cost support to off	set access charge reductions, and Connect America Phase II
0172011	support as set forth in 47 CFR § 54.313(b),(c),(d),(e			
		•		
	Incremental Connect America Phase I reporting			
<2010>	2nd Year Certification (47 CFR § 54.313(b)(1))			
<2011>	3rd Year Certification (47 CFR § 54.313(b)(2))			
	Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}			
<2012>	2013 Frozen Support Certification			
<2013>	2014 Frozen Support Certification		H	
<2014>	2015 Frozen Support Certification			
<2015>	2016 and future Frozen Support Certification		H	
	2020 dila fatate i fotali support cui difectori			
	Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))			
<2016>	Certification Support Used to Build Broadband			
			A. A. C.	
	Connect America Phase II Reporting (47 CFR § 54.313(e))			
<2017>	3rd year Broadband Service Certification			
<2018>	5th year Broadband Service Certification			
<2019>	Interim Progress Certification			
<2020>	Please check the box to confirm that the attached document(s), on pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support addresses of community anchor institutions to which began providing receding calendar year.	shall provide the number, names, an	mation d	
<2021>	Interim Progress Community Anchor Institutions	1		
<2021>	incerni Frogress Community Anchor institutions	1		
		Na	me of Attached Document Lis	ting Required Information

ata Coll	te Of Return Carrier Additional Documentation		FCC Form 481 OM8 Control No. 3060-0986/QM8 C July 2013	ontrol No. 3060-0819
<010>	Study Area Code	613006		
<015>	Study Area Name	COPPER VALLEY TEL		
<020>	Program Year	2015		
<030>	Contact Name - Person USAC should contact regarding this data  Contact Telephone Number - Number of person identified in data line <030>	Pamla R. Murphy 9078352231 ext.7721		
<039>	Contact Freebildine Number - Number of person identified in data line <030>	pmurphy#cvtc.ord		
CHECK to	ne boxes below to note compliance on its five year service quality plan (pursuar CFR § 54.313(f)(2). I further certify that th	nt to 47 CFR § 54.202(a)) and, for privately held one information reported on this form and in the o		quirements set forth in 4
(3010)	Progress Report on 5 Year Plan Milestone Certification {47 CFR § 54.313{f}(1){i}}	Name of Attached Document Listing	Required Information	
	Please check this box to confirm that the attached document(s), on line \$ § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addreproviding access to broadband service in the preceding calendar year.			
(3012)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}			
(3013) (3014)	Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2)) If yes, does your company file the RUS annual report	Name of Attached Document Listing Required	Information (Yes/No) (Yes/No)	
Please	check these boxes to confirm that the attached document(s), on line 301	7, contains the required information pursuan	t to § 54.313(f)(2) compliance requires:	
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)			
(3016)	Document(s) for Balance Sheet, Income Statement and Statement of Ca	sh Flows 613006ak3017.pdf		
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation			
		Name of Attached Document Listing Required	Information	
(3018)	If the response is no on line 3014, Is your company audited?		(Yes/No)	
	If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains			
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a f	ormat comparable to RUS Operating Report for T	elecommunications	
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of C	ash Flows	4	
(3021)	Management letter issued by the independent certified public accountant that	performed the company's financial audit.		
(3022)	If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § \$4.313(f)(2), contains:			
(3022)	independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications			
(3023)	Borrowers, Underlying information subjected to a review by an independent certified			
(3024)	public accountant Underlying information subjected to an officer certification. Document(s) for Balance Sheet, income Statement and Statement of C	ash Finws		
	Attach the worksheet listing required information	autre 19770		

The State of the S	ion - Reporting Carrier ection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	613006
<015>	Study Area Name	COPPER VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Pamla R. Murphy
<035>	Contact Telephone Number - Number of person identified in data line <030>	9070352231 sxt,7721

### TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

<039> Contact Email Address - Email Address of person identified in data line <030> pmumphy@ovto.org

Certification of Officer as to the Acc	uracy of the Data Reported for the Annual Reporting for	CAF of LI Recipients
certify that I am an officer of the reporting carrier; my responsibilit recipients; and, to the best of my knowledge, the information report	: [1] [1] [1] [1] [1] [1] [1] [1] [1] [1]	nents for universal service suppor
Name of Reporting Carrier: COPPER VALLEY TEL		
Signature of Authorized Officer: CERTIFIED ONLINE		Date 06/27/2014
Printed name of Authorized Officer: Pamla Murphy		
Title or position of Authorized Officer: Chief Financial Officer		
Telephone number of Authorized Officer: 9078352231 ext.7721		
Study Area Code of Reporting Carrier: 613006	Filing Due Date for this form: 07/01/2014	

Certification - Agent / Carrier Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	613006
<015>	Study Area Name	COFPER VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Pamla R. Murphy
<035>	Contact Telephone Number - Number of person identified in data line <030>	9078352231 ext,7721
<039>	Contact Email Address - Email Address of person identified in data line <030>	pmurphy@cvtc.org

### TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

certify that (Name of Agent)	is authorized to submit the information reported on behalf of the reporting c	rrier. I		
iso certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized igent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.				
Name of Authorized Agent:				
Name of Reporting Carrier:				
Signature of Authorized Officer:	Date:			
Printed name of Authorized Officer:				
Title or position of Authorized Officer:				
Telephone number of Authorized Officer:				
Study Area Code of Reporting Carrier;	Filling Due Date for this form:			

#### TO BE COMPLETED BY THE AUTHORIZED AGENT:

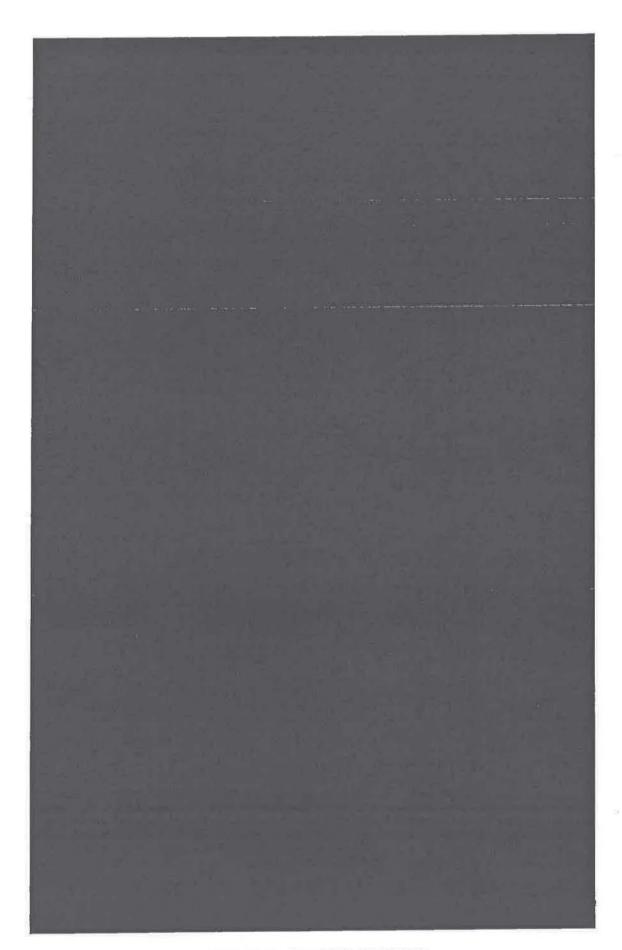
Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier			
	orized to submit the annual reports for universal service suppore porting carrier; and, to the best of my knowledge, the information of the contract of the co		
Name of Reporting Carrier:			
Name of Authorized Agent or Employee of Agent:			
Signature of Authorized Agent or Employee of Agent:		Date:	
Printed name of Authorized Agent or Employee of Agent:			
Title or position of Authorized Agent or Employee of Agent			
Telephone number of Authorized Agent or Employee of Ago	ent:		
Study Area Code of Reporting Carrier:	Filling Due Date for this form:		

Attachments

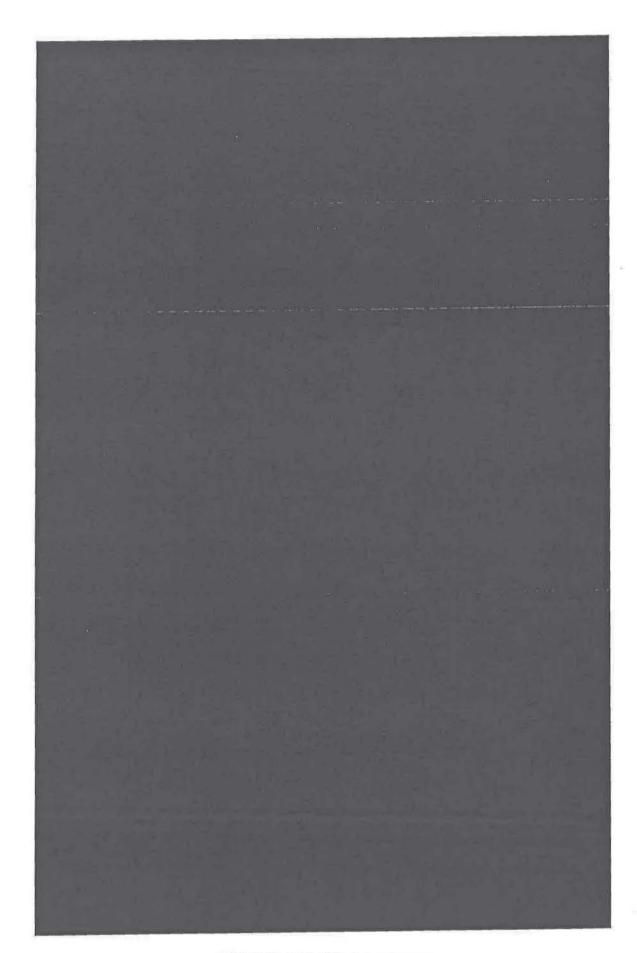


# Copper Valley Telephone Cooperative, Inc. FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN

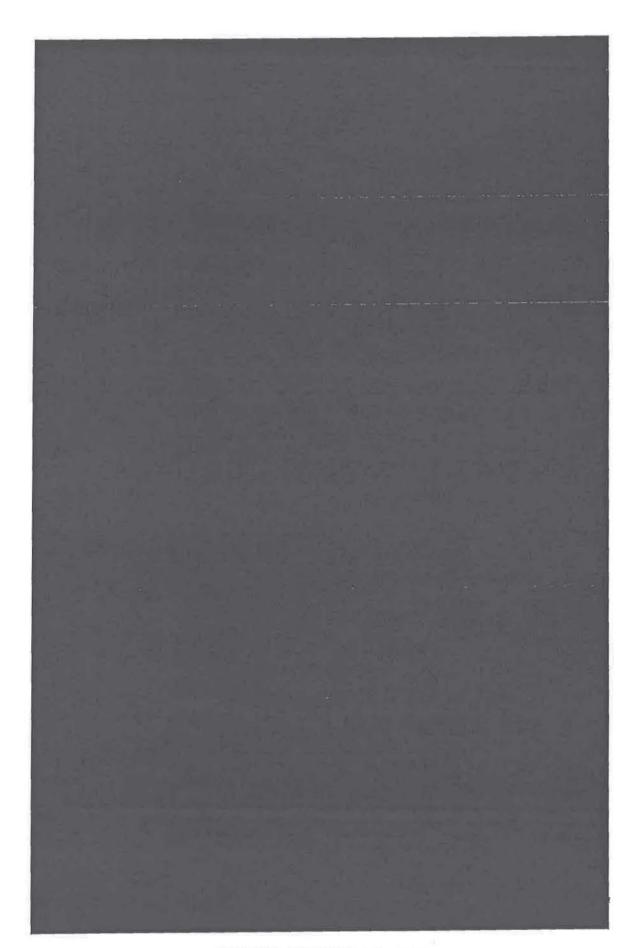




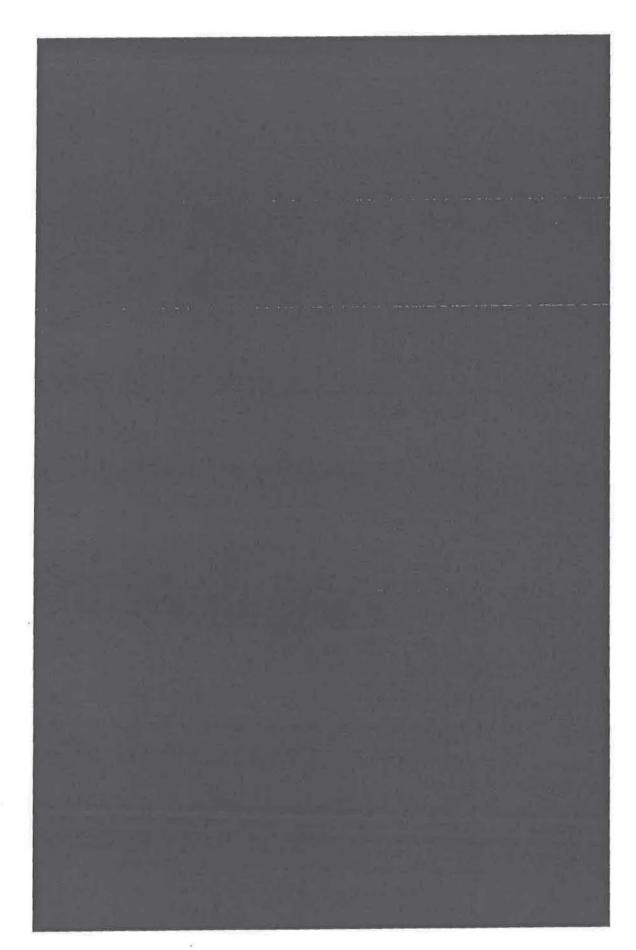
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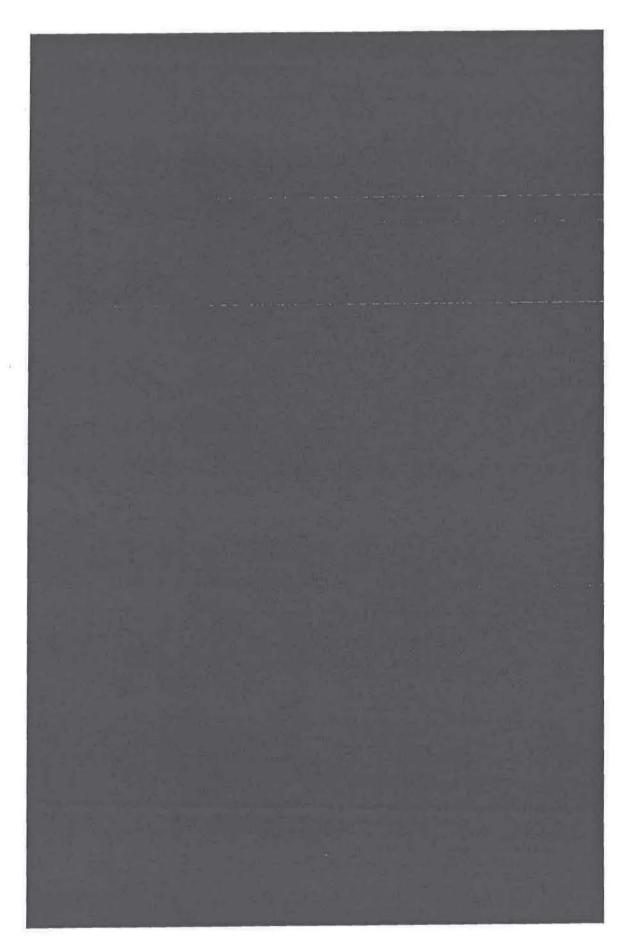
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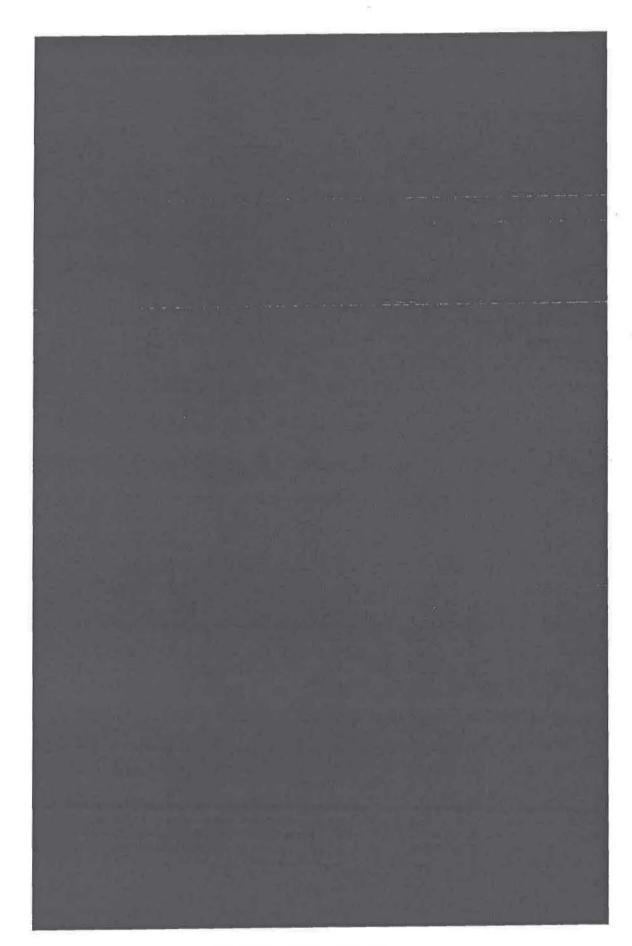
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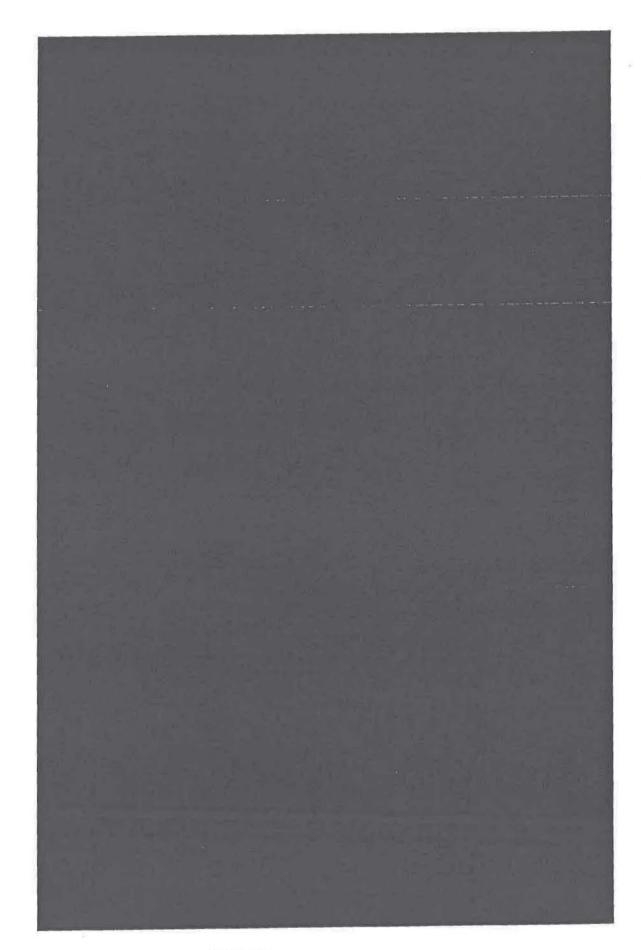
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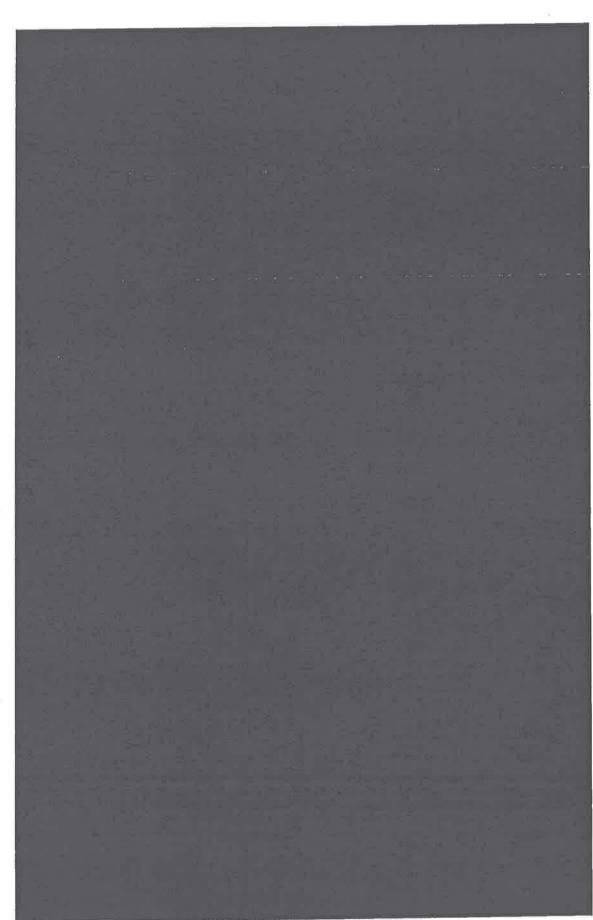
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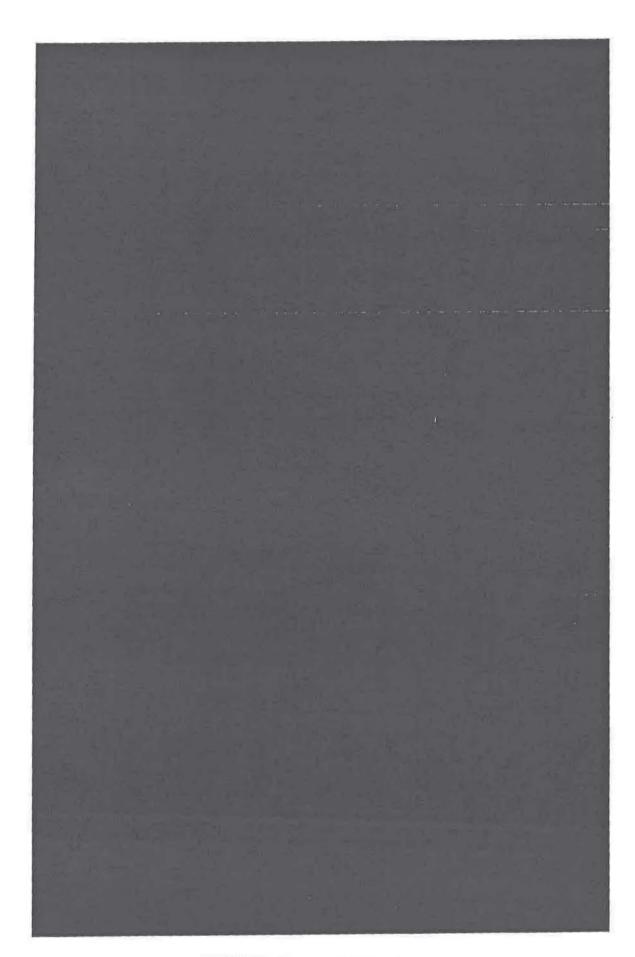
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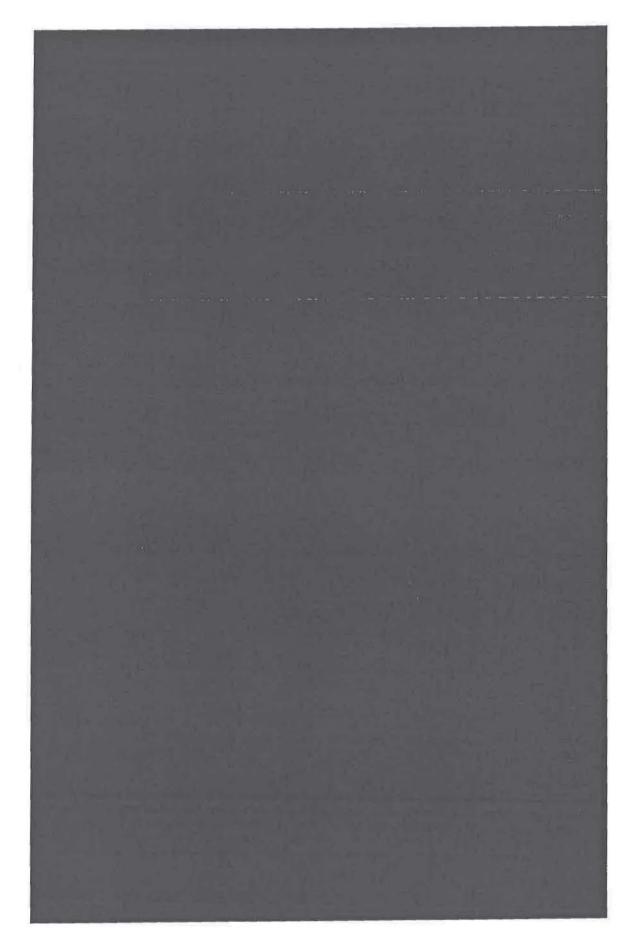
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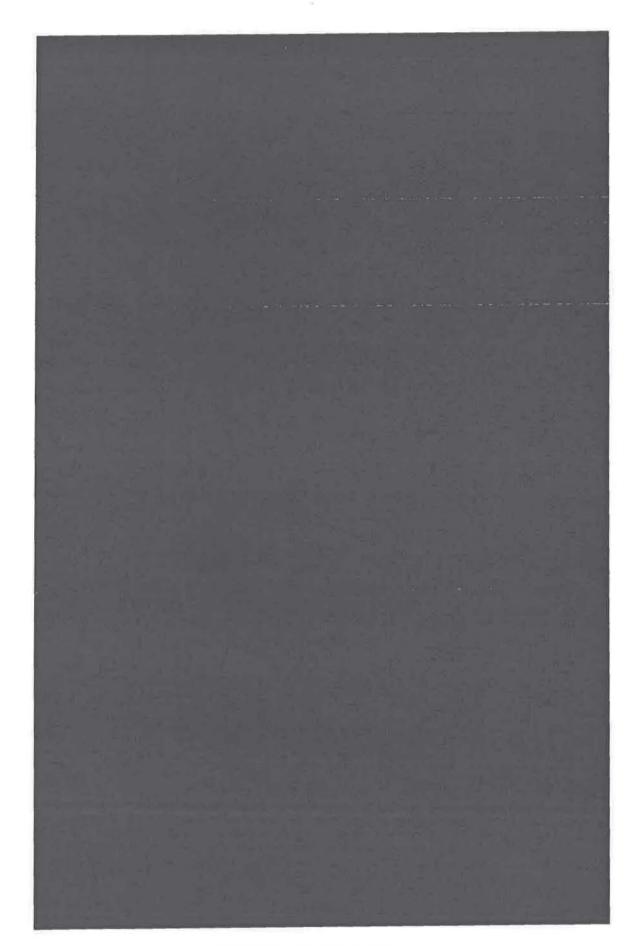
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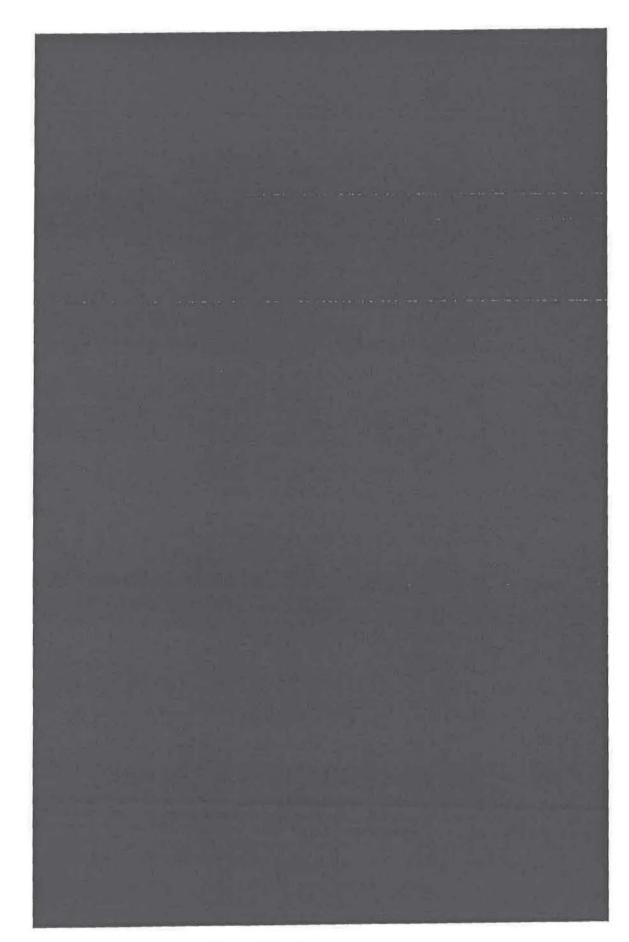
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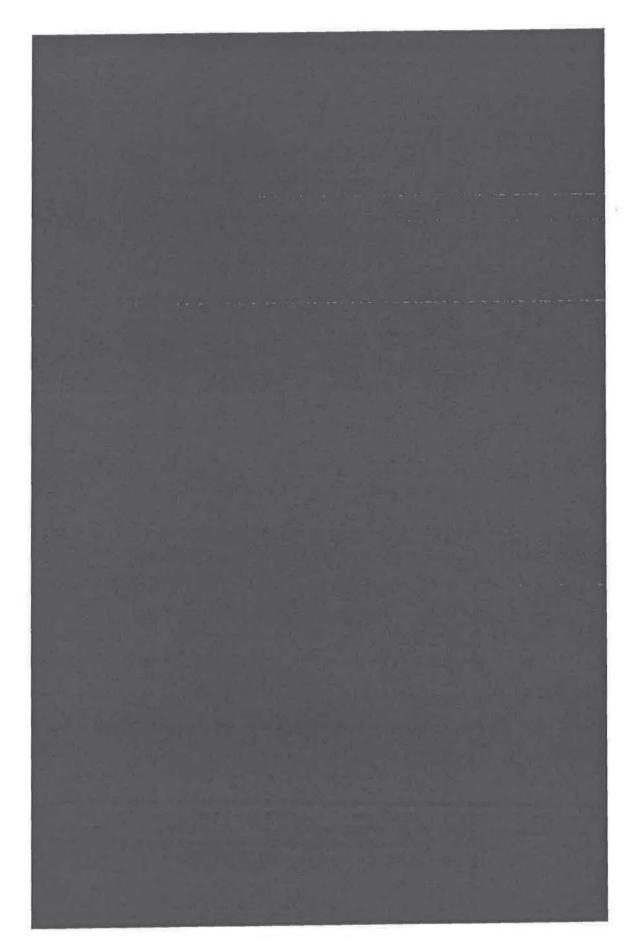
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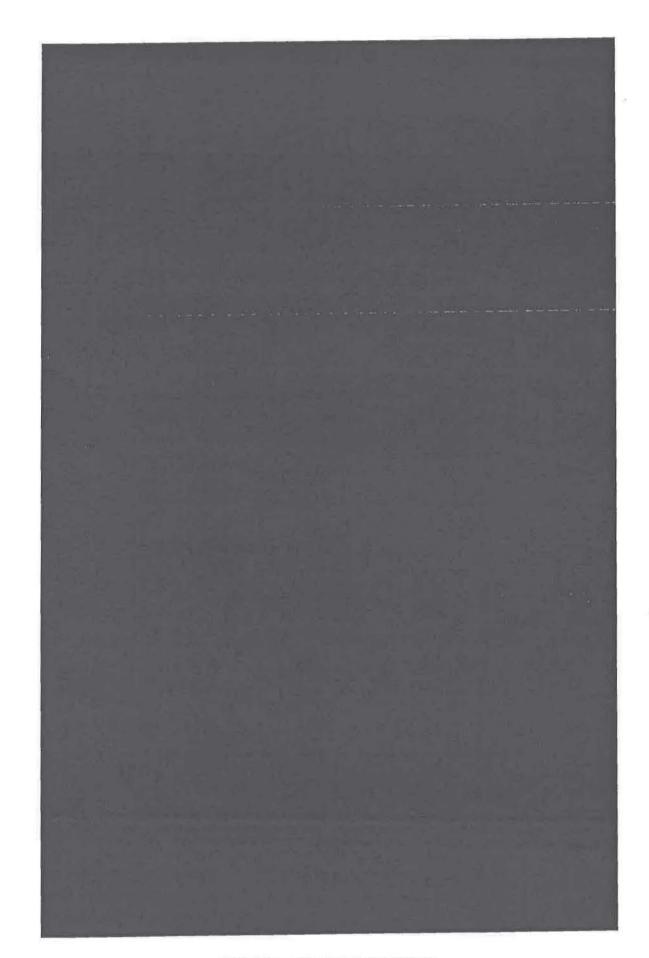
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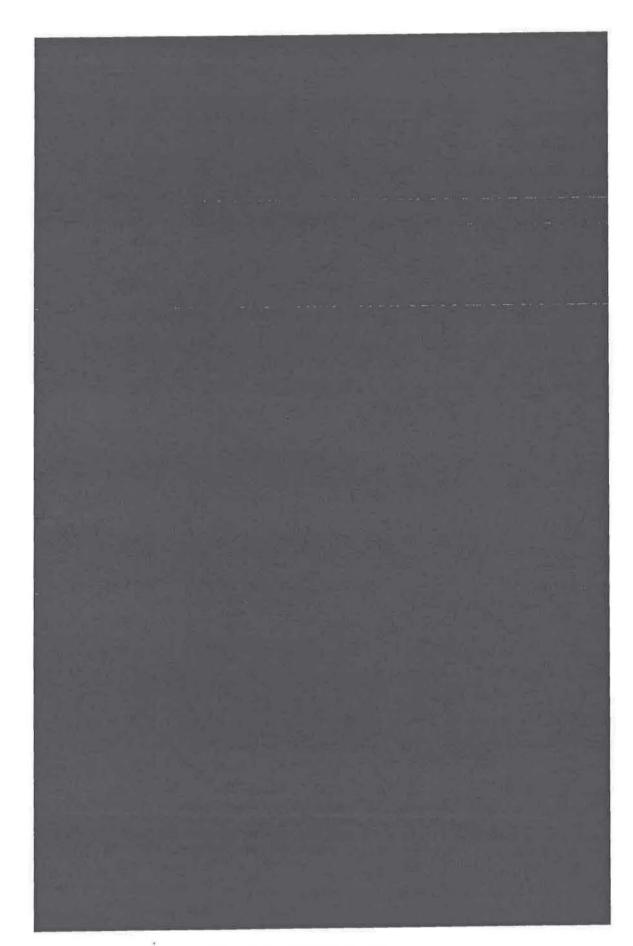
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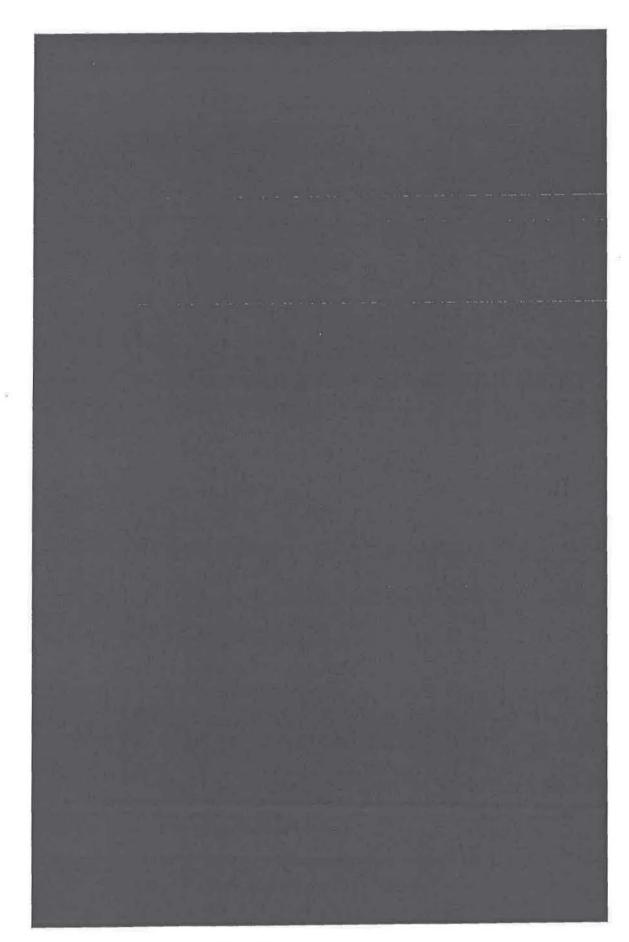
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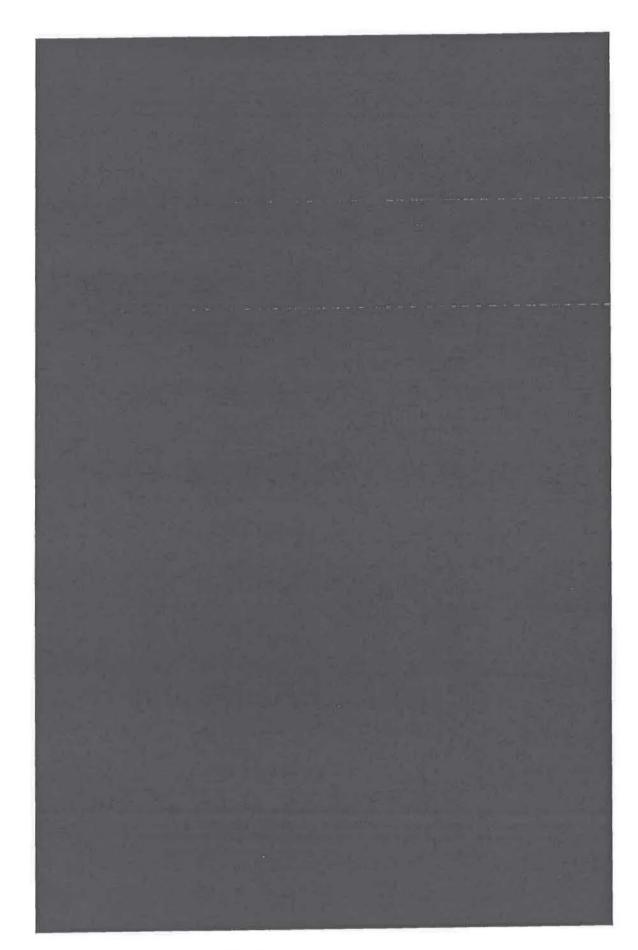
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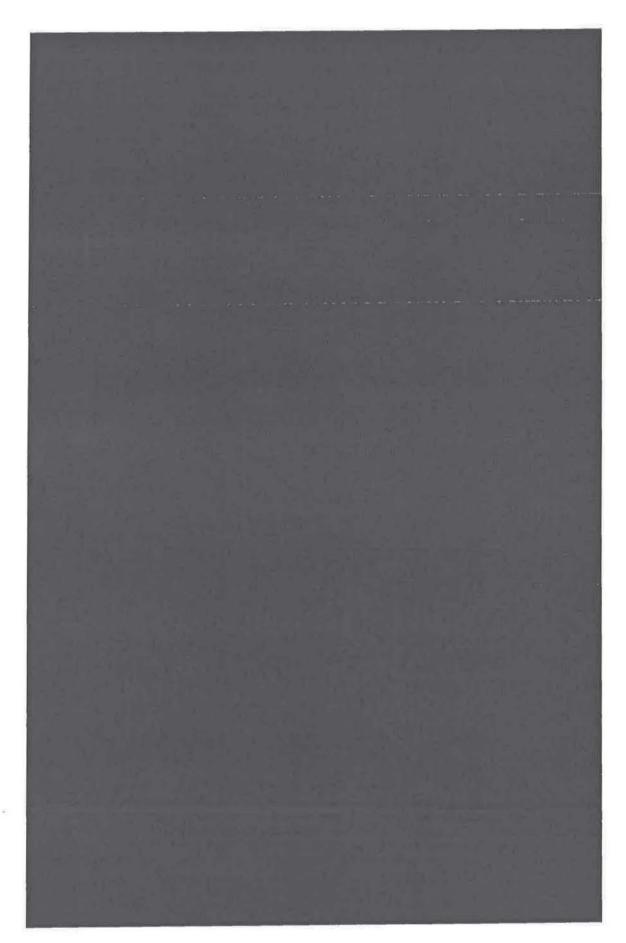
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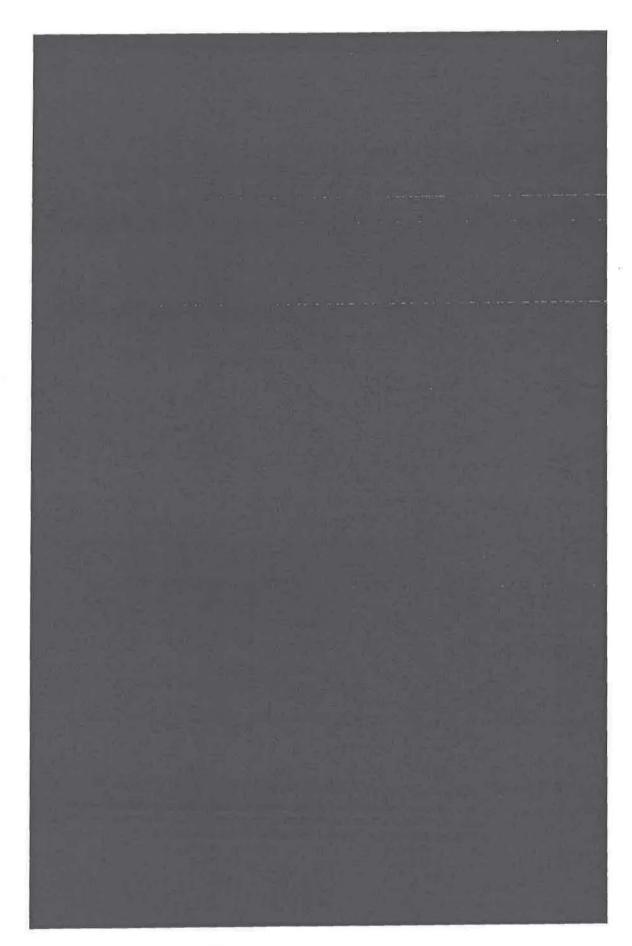
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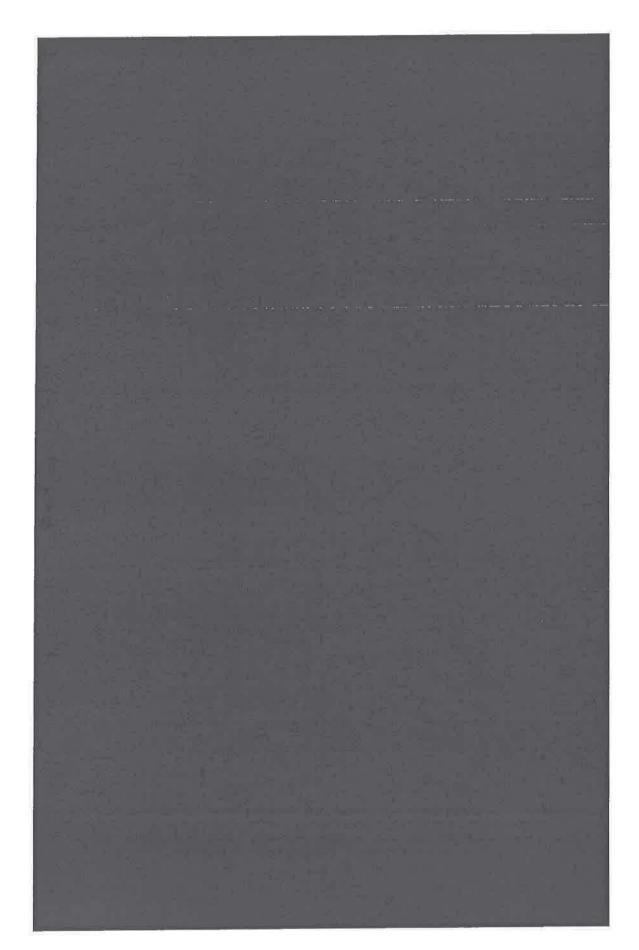
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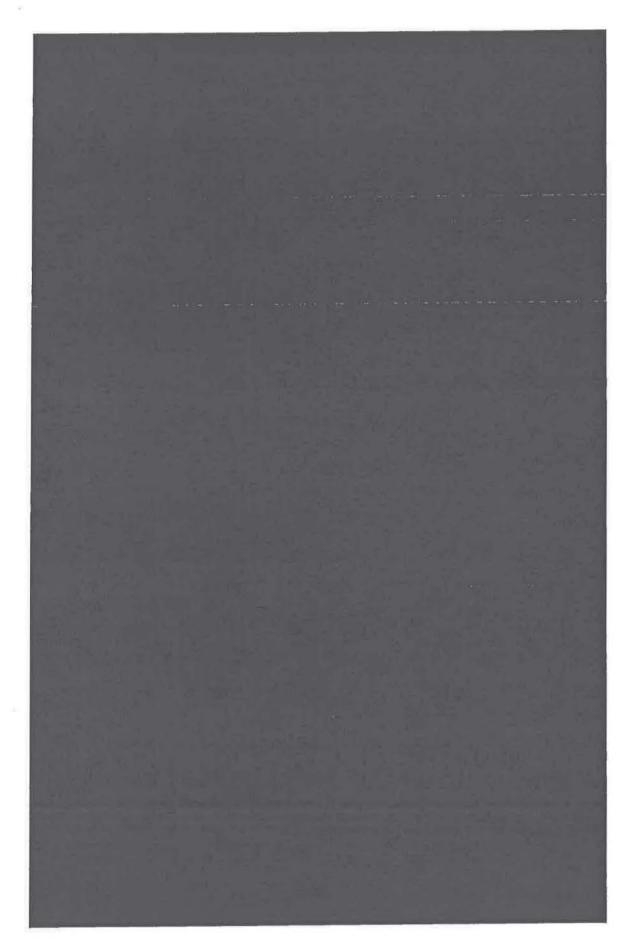
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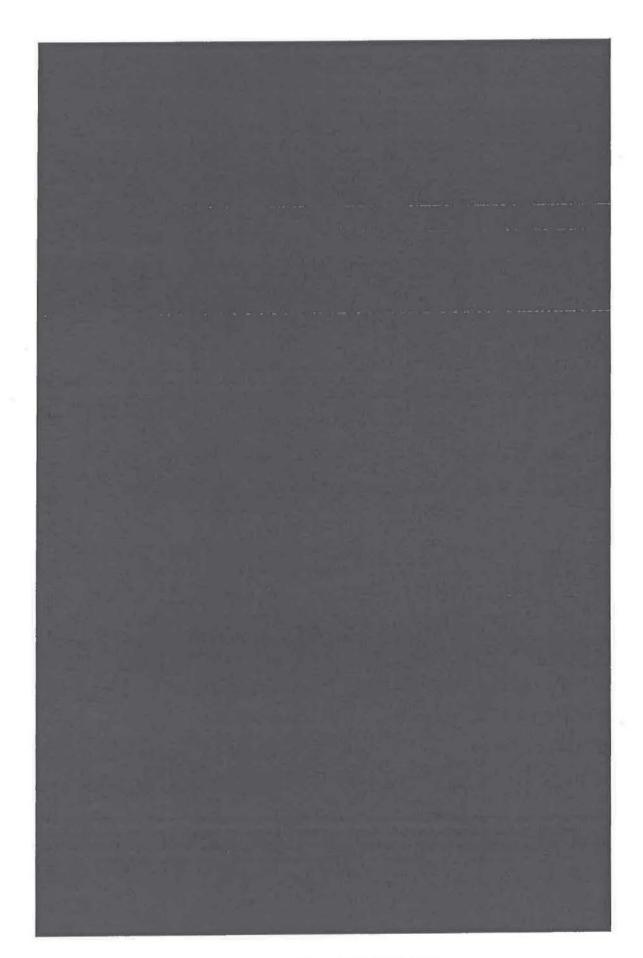
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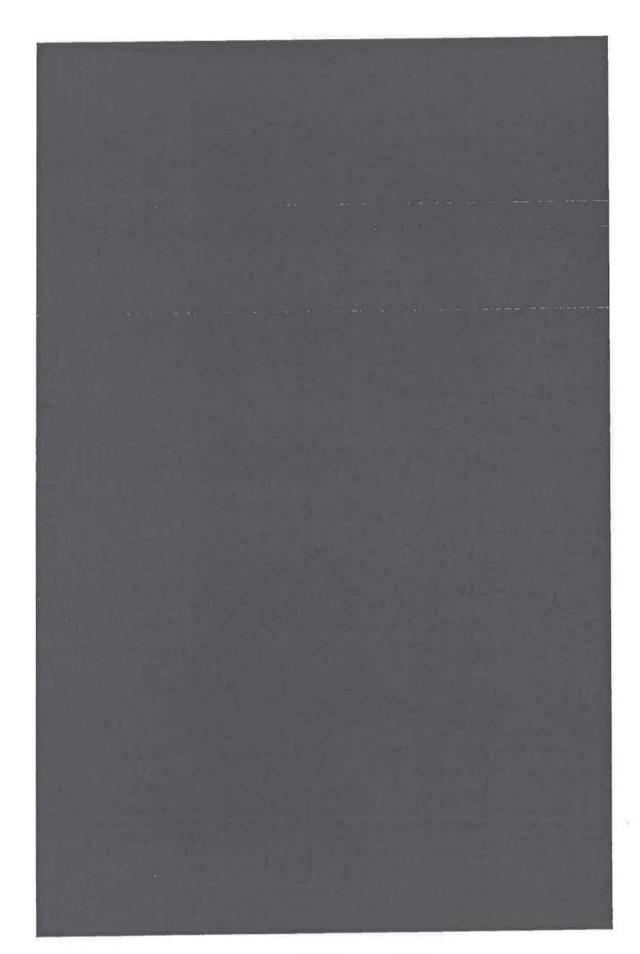
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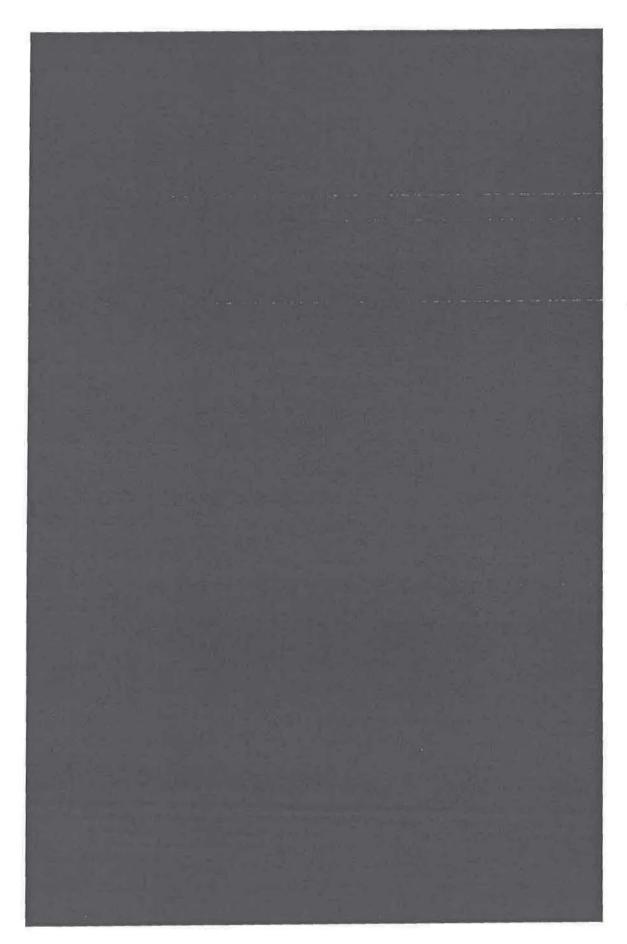
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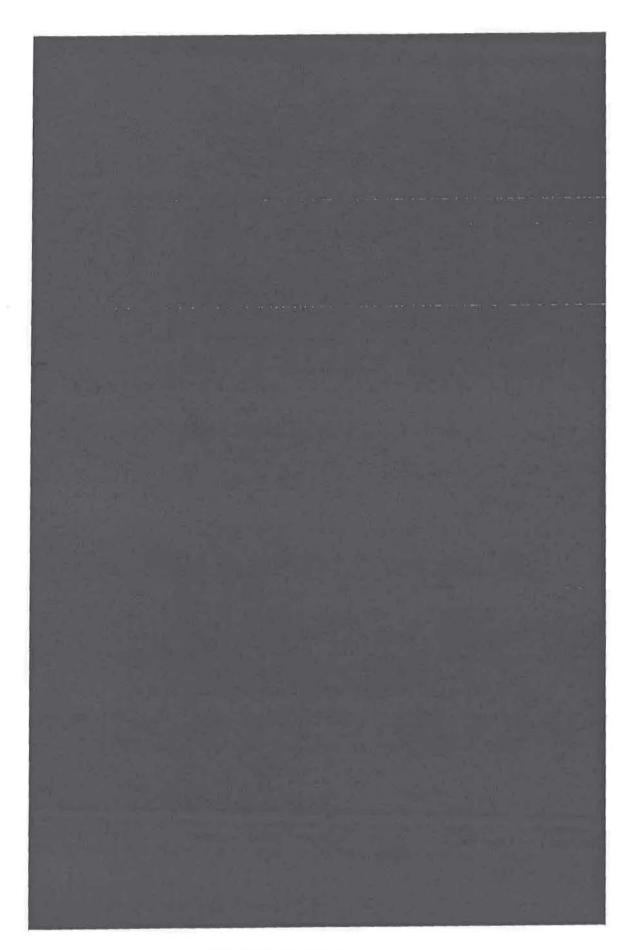
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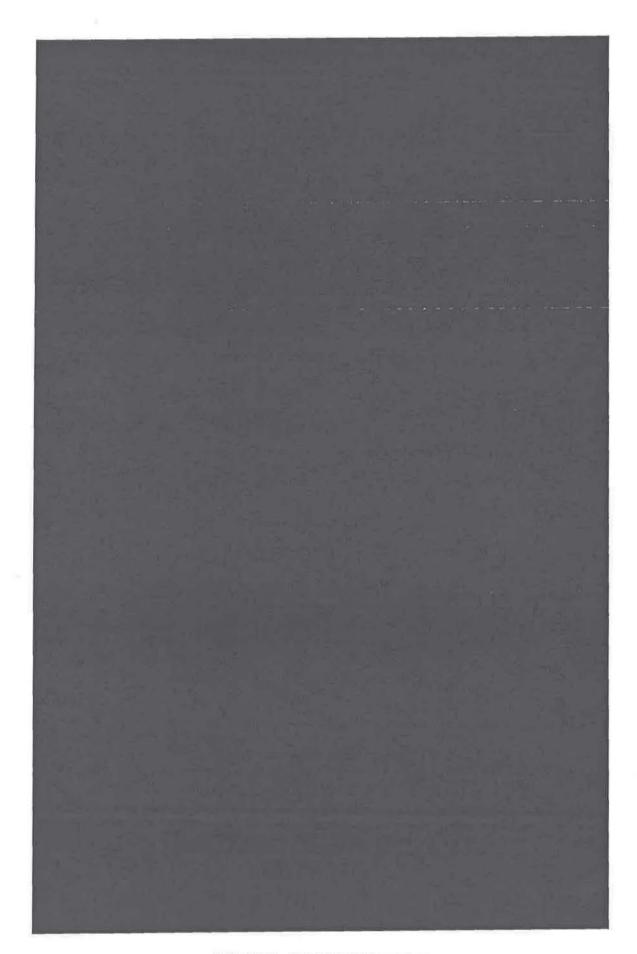
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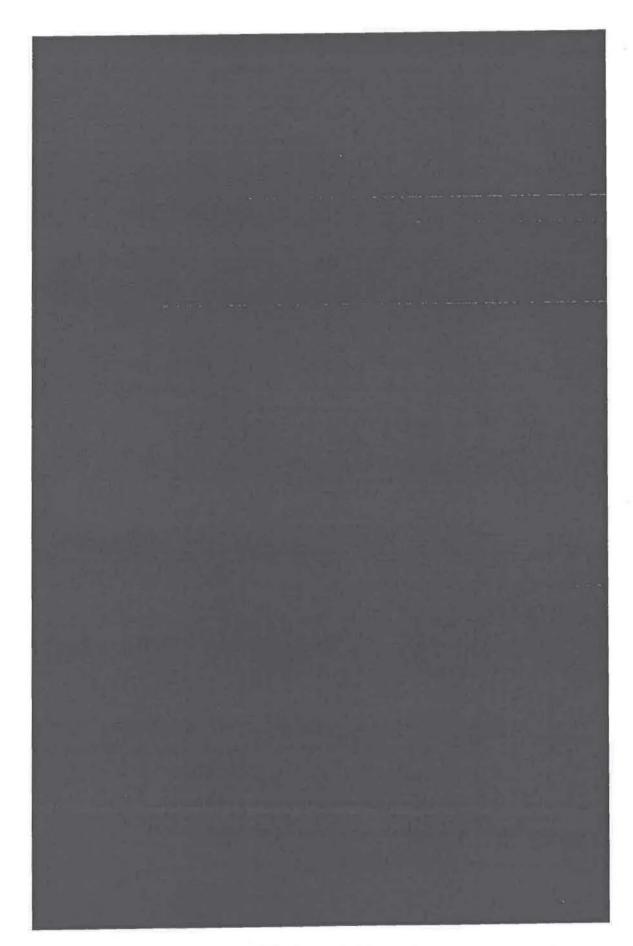
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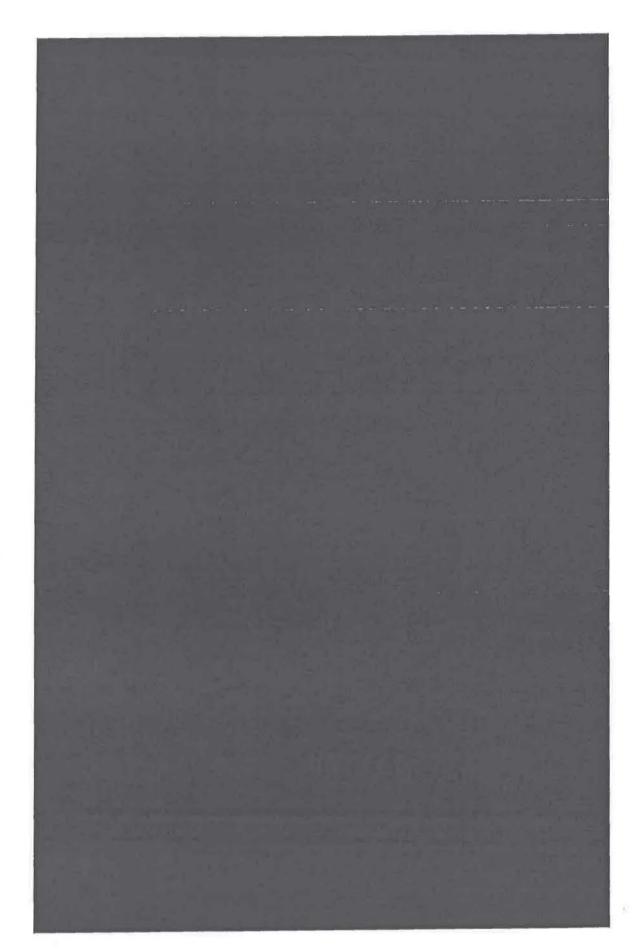
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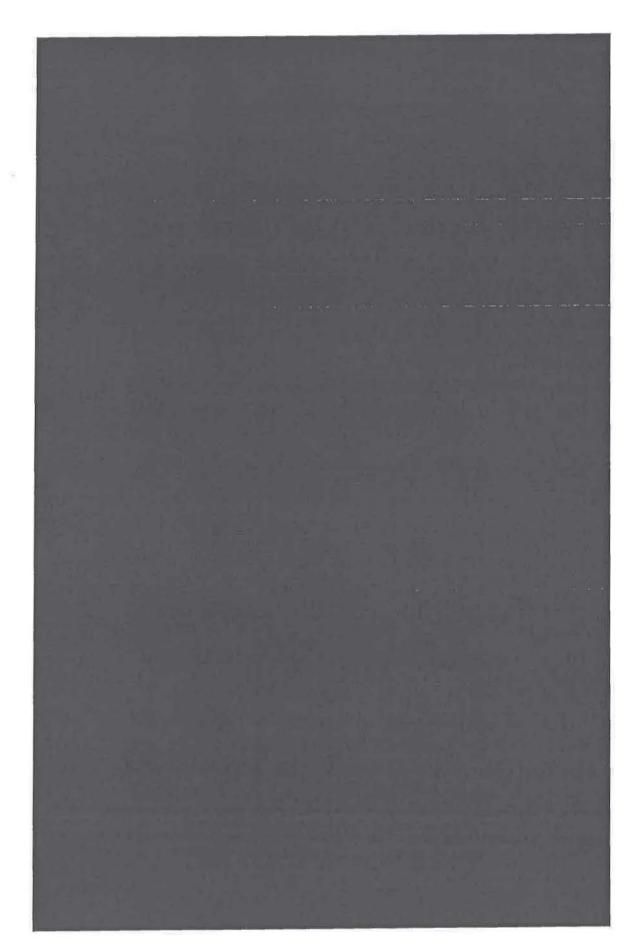
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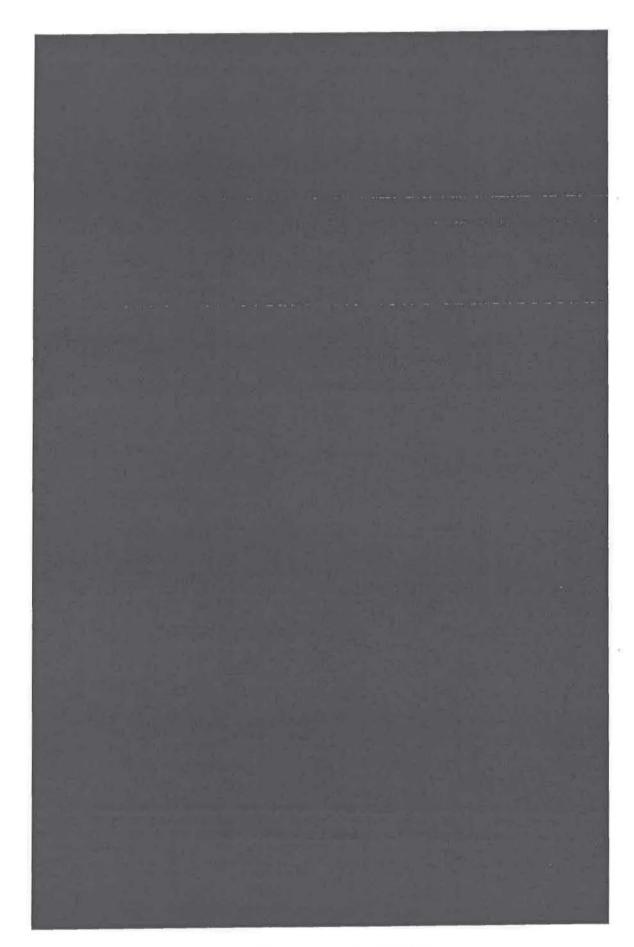
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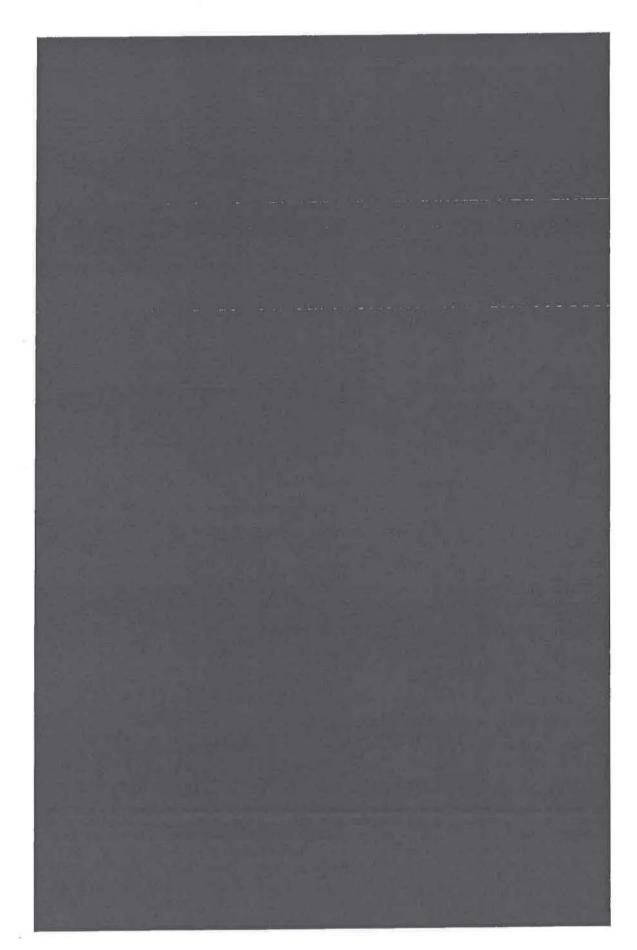
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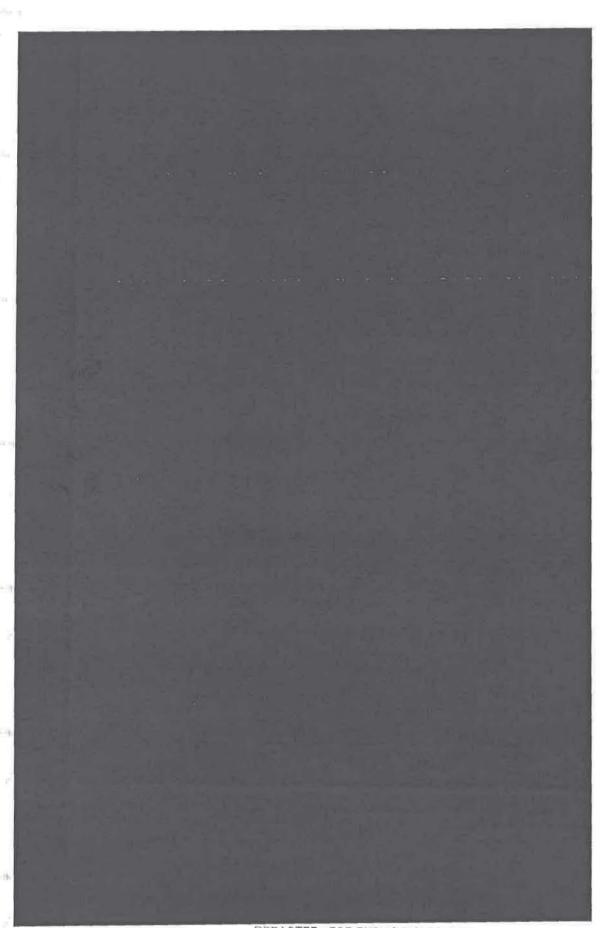


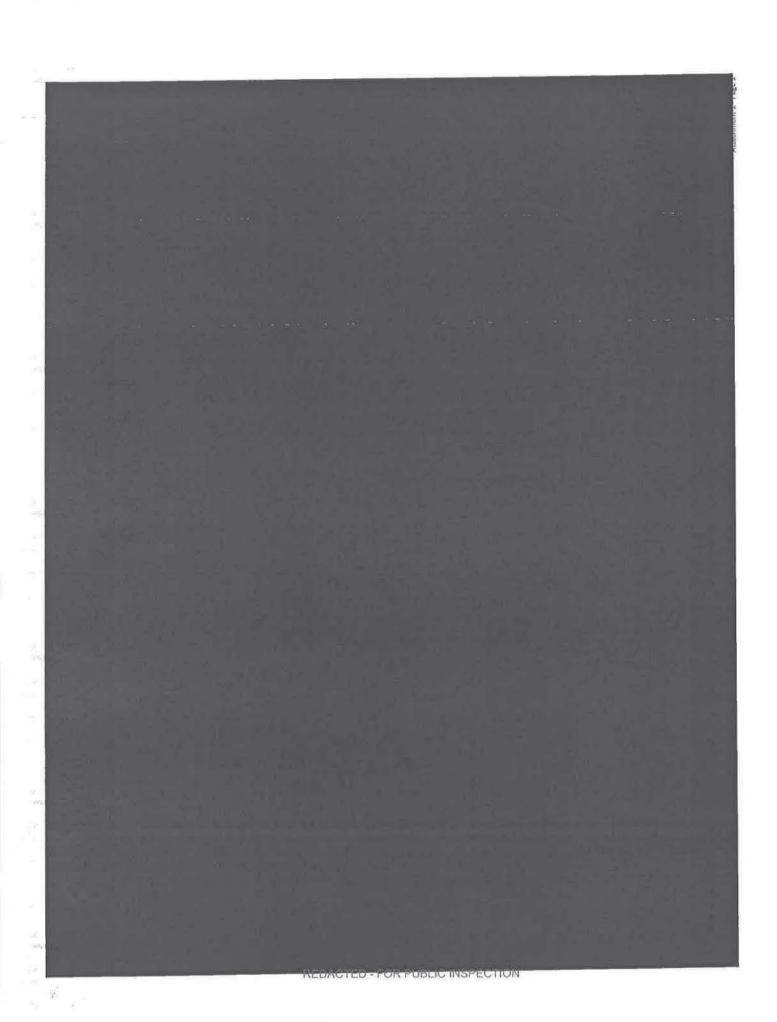
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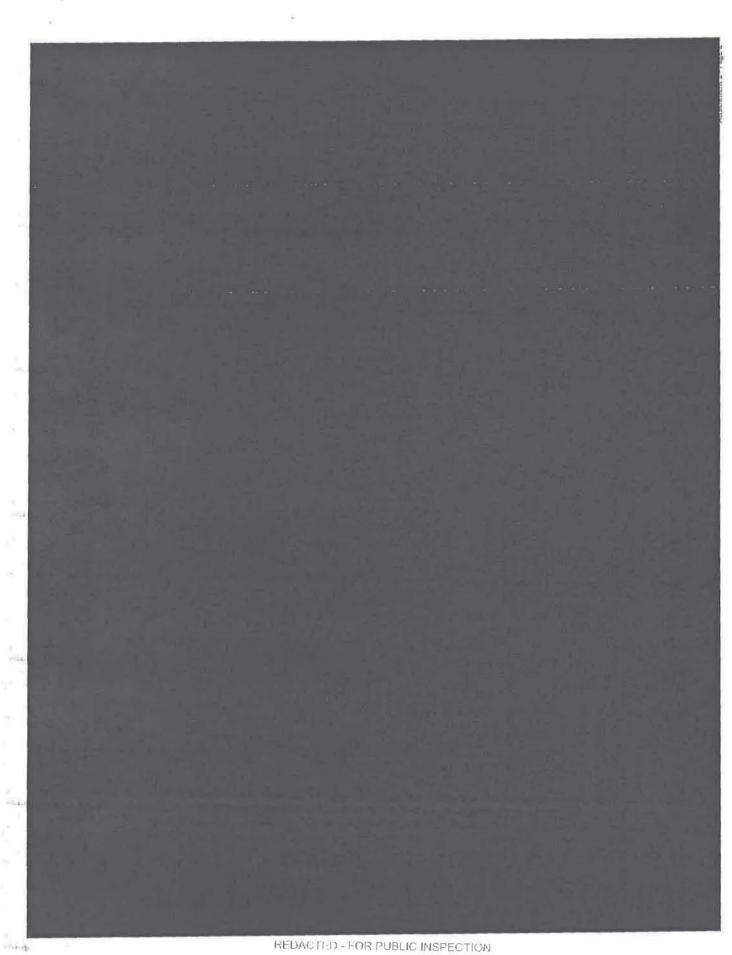


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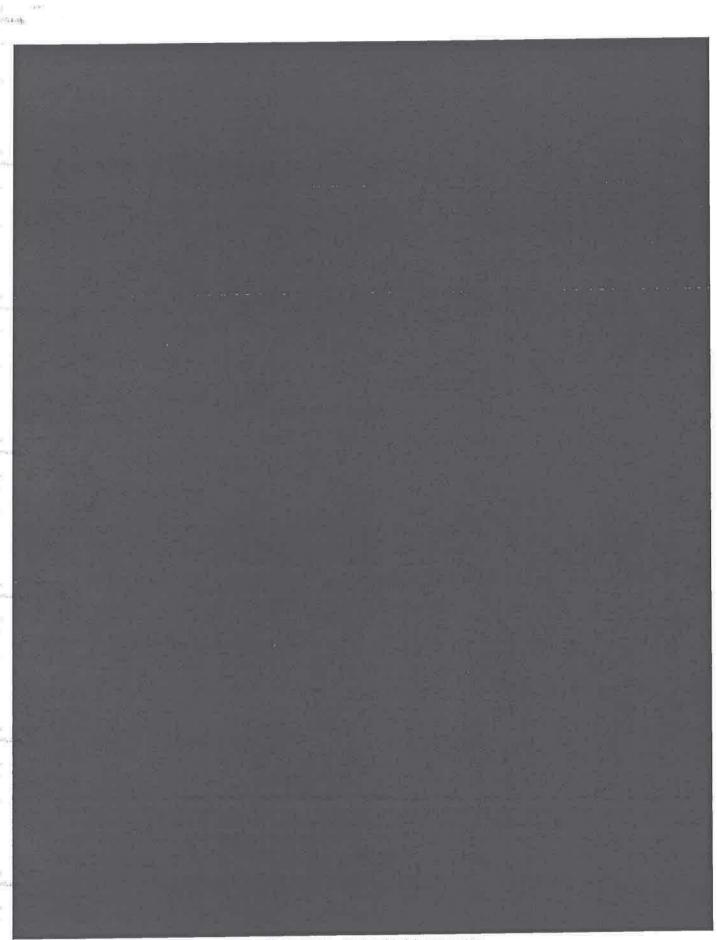






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Copper Valley Telephone Cooperative, Inc.

SAC: 613006

LINE: 510 - SERVICE QUALITY STANDARDS & CONSUMER PROTECTION RULES COMPLIANCE

## Consumer Protection - Voice and Broadband

Copper Valley Telephone Cooperative, Inc. complies with the requirements of 47 CFR Part 64 Subpart U, Customer Proprietary Network Information and the Federal Trade Commission Red Flag rules to prevent identity theft. A manual for each of those programs is in place and is part of the employees' handbook. Employee training is conducted annually and new hires are instructed on the programs as required by their job functions.

# Service Quality Standards

## Voice

**Copper Valley Telephone Cooperative, Inc.** complies with the service standards of the State of Alaska as promulgated in the Alaska Administrative Code 3 AAC 53.700 State Telecommunications Modernization Plan.

## Broadband

**Copper Valley Telephone Cooperative, Inc.** follows the service standards noted in NECA Tariff #5 and is committed to provide the highest quality service to its broadband customers.

Copper Valley Telephone Cooperative, Inc.

SAC: 613006

## LINE 610 - DESCRIPTION OF FUNCTIONALITY IN EMERGENCY SITUATIONS

## **Back-up Power**

Copper Valley Telephone Cooperative, Inc. (CVTC) has the following back-up power capabilities for both voice and data:

**Switches** 

VALDEZ CO SWITCH

Back-up Gen Set, 50 KW, Auto Start, 120 / 208 3 phase, hard-wired 50KW diesel generator with 1000 gallon on site fuel storage, battery plant chargers are 3 phase 208 VAC emergency run time in excess of one week based on full tank. Reserve battery power greater than or equal

to 8 hours

**GLENNALLEN CO SWITCH** 

Back-up Gen Set, 120 KW, Auto Start, 120 / 208 3 phase, hard wired 130KW diesel generator with 5000 gallon on site fuel storage, battery plant chargers are 3 phase 208 VAC, emergency run time in excess of plant chargers are 3 phase 208 VAC, emergency run time in excess of two weeks with full tank. Reserve battery power greater than or equal to 8 hours

MENTASTA CO SWITCH

Building, 120 / 240 VAC manual transfer switch with plug. Reserve

battery power greater than or equal to 8 hours

CHITINA CO SWITCH

Standby generator on site. Building, 120 / 240 auto transfer, 12KW diesel generator with 125 gallon on site fuel storage battery plant chargers are 240 VAC emergency run time approximately one week with full capacity

tank. Reserve battery power greater than or equal to 8 hours

TATITLEK CO SWITCH

Building, 120 / 240 VAC auto transfer switch with plug.

12KW diesel generator mounted on 400 gallon tank, emergency run-time of approximately one week. Reserve battery power greater than

or equal to 8 hours.

MCCARTHY CO SWITCH

Off electrical grid, 1500Ah battery bank. Reserve battery power greater

than or equal to 8 hours. Redundant 10.5KW diesel,

continuous run generators. 1x3000 and 1x6000 gallon fuel storage tanks

allow approximately 18000 hours of runtime. Fueled annually.

## Subscriber Carrier (DLC, AFC, OPM, etc.)

**Shoup Bay** 

Off electrical grid. Redundant 7KW DC propane fired, cycle run generators, 3.2 KW solar array, 1KW wind generator, 1600Ah battery bank. 3x1000 gallon propane storage tanks allow approximately 1500 hours of generator run time. Fueled semi-annually. Portable generator through rectifier system. Reserve battery power greater than or equal to to 8 hours.

Naked Island Off electrical grid, Redundant 10KW DC propane fired, cycle run

generators, 8.5 KW solar array, 4600Ah battery bank. 6x1000 gallon propane storage tanks allow approximately 3000 hours of generator run time. Fueled semi-annually. Site can be powered by portable generator through rectifier system. Reserve battery power greater than or equal to

8 hours.

Tatitlek Microwave Building, 120/240 VAC, fed from Tatitlek CO which has 12 KW auto start

stand-by generator (see TATITLEK CO). Reserve battery power greater than

or equal to 8 hours

Lake Louise Off electrical grid, Redundant 7KW DC propane fired, cycle run generators,

4.05 KW solar array, 1600Ah battery bank

1x1000 gallon and 2x300 propane storage tanks allow approximately 800 hours of generator run time. Fueled monthly. Site can be powered by portable generator through rectifier system. Reserve battery power

greater than or equal to 8 hours

Tangle Lakes Repeater Off electrical grid, summer operation only. 48V power. 1.7 KW solar array.

Batteries provide 14 days of run time without solar. Reserve battery

power greater than or equal to 8 hours

Valdez Airport CSA Building, 120 / 240 VAC manual transfer switch with plug, chargers are 240

volt. Reserve battery power greater than or equal to 8 hours

Alpine Woods CSA Building, 120 / 240 VAC manual transfer switch with plug, chargers are 240

volt. Reserve battery power greater than or equal to 8 hours

Alyeska OCC On customer premise, customer UPS power, 120 volt, restricted access.

Reserve battery power greater than or equal to hours

Grain Term Building, 120 / 240 VAC, chargers are 240 volt, auto-start 12 KW gen set

with 125 gallon on site fuel storage. Reserve battery power greater than or

equal to 8 hours

Court House AFC in basement small room, Cabinet with battery back-up, 120 volt wall

plug. Reserve battery power greater than or equal to 8 hours

CVEA Hydro AFC in warehouse indoor wall mount cabinet, Charger & Battery, 120VAC,

Wall plug. Reserve battery power greater than or equal to 8 hours

AFC Cabinet, 120 volt wall plug, CVEA back-up gen set on site Reserve

CVEA Petro Star battery power greater than or equal to 8 hours

CVTC B1 AFC in Comm Room with battery back-up, 120 volt wall plug Reserve

battery power greater than or equal to 8 hours

DOT Thompson Pass AFC Cabinet, 120 volt wall plug. Reserve battery power greater than or

equal to 8 hours

FAA ANCS site Customer Premise in FAA Building, Customer UPS power, 120 volt

Heidenview CSA 120/240 VAC manual transfer switch. Charger are 120V. Reserve battery

power greater than or equal to 8 hours

Meals Substation AFC Cabinet, Manual transfer switch inside, 120 volt. Reserve battery

power greater than or equal to 8 hours

Robe River CSA Building, 120 / 240 VAC manual transfer switch with EMG plug, cord on

site, chargers are 240 volt. Reserve battery power greater than or equal to

8 hours

Robe LK CSA AFC Cabinet, Manual transfer switch inside, cord in cabinet, 120 volt.

Reserve battery power greater than or equal to 8 hours

SERVS AFC AFC & Sonet in Comm Room, CVTC chargers and battery, 120 VAC, Wall

plug. Reserve battery power greater than or equal to 8 hours

USCG MSO AFC & Sonet in Comm Room, CVTC chargers and battery, 120 VAC, Wall

plug. Reserve battery power greater than or equal to 8 hours

WCI Dayville / CVEA Customer Premise, 48VDC From Customer Power Plant. Customer Battery

Basin CSA RSC/240 Cabinet, Breaker inside cabinet, Cord on site. Reserve battery

power greater than or equal to 8 hours

Midpoint CSA RSC/48 Cabinet, 120 volt. Reserve battery power greater than or equal to

8 hours

Tolsona Wilderness RSC/48 Cabinet, 120 volt. Reserve battery power greater than or equal to

8 hours

Tolsona Lake RSC/120 Cabinet. Reserve battery power greater than or equal to 8 hours

Atlasta House Transfer switch inside. Reserve battery power greater than or equal to 8

hours

Glenn Hwy Mile 164.4 CSA DC line powered from Atlasta House (8 Hour Battery backup)

Tolsona Ridge Building, 120 / 240 VAC manual transfer switch with EMG plug. Reserve

battery power greater than or equal to 8 hours

Smokey Lake CSA RSC/240 Cabinet, 120 volt. Reserve battery power greater than or equal

to 8 hours

Mendeltna CSA Gln Hwy Mile 152.6	DC line powered from Snowshoe CSA. Reserve power > or = to 8 hours
Snowshoe CSA	RSC/240 Cabinet. Reserve battery power greater than or equal to 8 hours
Nelchina CSA	Building, transfer switch inside. Reserve battery power greater than or equal to 8 hours
Virgin CSA Gln Hwy Mile 140 CSA	RSC/48 Cabinet, Breaker inside cabinet, remove cord after AC commercial power stabilizes, cord in cabinet, 120 volt. Reserve Power > or = to 8 hours
Nelchina River CSA Gln Hwy Mi 135	RSC/48 Cabinet, 120 volt. Reserve battery power greater than or equal to 8 hours
Eureka CSA Gln Hwy Mi 128	RSC/240 Cabinet, 120 volt. Reserve battery power greater than or equal to 8 hours
Airport CSA Rich Hwy Mi 118	RSC/240 Cabinet, 120 volt. Reserve battery power greater than or equal to 8 hours
Paxson CSA Rich Hwy Mi 185.5	RSC/240 Cabinet. Reserve battery power greater than or equal to 8 hours
Richardson CSA Rich Hwy Mi 128	Building, 120 / 240 VAC manual transfer switch with EMG plug. Reserve battery power greater than or equal to 8 hours
Tazlina CSA Rich Hwy Mi 111.5	Building, 120 / 240 VAC manual transfer switch with EMG plug. Reserve battery power greater than or equal to 8 hours
Silver Springs CSA Old Rich Hwy Mi 105	Building, 120 / 240 VAC manual transfer switch with EMG plug. Reserve battery power greater than or equal to 8 hours
Copper Center CSA Old Rich Hwy Mi 101	RSC/240 Cabinet, Breaker inside cabinet. Reserve battery power greater than or equal to 8 hours
Princess Hotel CSA Tazlina Rd. MP 1	RSC/120 Cabinet, 120 volt. Reserve battery power greater than or equal to 8 hours
Grizzly CSA Rich Hwy Mi 93	RSC/120 Cabinet. Reserve battery power greater than or equal to 8 hours
Willow Lake CSA Rich Hwy Mi 89	RSC/120 Cabinet, 120 volt. Reserve battery power greater than or equal to 8 hours
Squirrel Creek CSA Rich Hwy Mi 79	RSC/240 Cabinet, 120 volt. Reserve battery power greater than or equal to 8 hours
Ernestine CSA	Standby generator on site Building, auto transfer 8KW diesel generator

with 125 gallon on site fuel storage, battery plant chargers are 240 VAC,

emergency run time approximately one week.	Reserve battery power
greater than or equal to 8 hours	

Tiekel CSA Rich Hwy Mi 56 DC line powered from Ernestine CSA. Reserve battery power greater than

or equal to 8 hours

Serendipity CSA Rich Hwy Mi 44 DC line powered from Ernestine CSA. Reserve battery power greater than

or equal to 8 hours

Old Edgerton CSA RSC/240 Cabinet, 120 volt. Reserve battery power greater than or equal to

8 hours

Edgerton MW/CSA Building, 120 / 240 VAC manual transfer switch with EMG plug. Reserve

battery power greater than or equal to 8 hours

Edgerton Mi 4 CSA RSC/48 Cabinet, 120 volt. Reserve battery power greater than or equal to

8 hours

Kenny Lake CSA Building, 120 / 240 VAC manual transfer switch with EMG plug. Reserve

battery power greater than or equal to 8 hours

Hargreaves CSA RSC/240 Cabinet, 120 volt. Reserve battery power greater than or equal

to 8 hours

SAPA CSA RSC/240 Cabinet, 120 volt. Reserve battery power greater than or equal to

8 hours

Lower Tonsina CSA RSC/120 Cabinet, 120 volt. Reserve battery power greater than or equal to

8 hours

Gakona CSA RSC/240 Cabinet. Reserve battery power greater than or equal to 8 hours

Tok Nine Mife RSC/240 Cabinet, 120 volt. Reserve battery power greater than or equal

to 8 hours

Aurora CSA Building, 120 / 240 VAC manual transfer switch with EMG plug. Reserve

battery power greater than or equal to 8 hours

Chistochina CSA Building, 120 / 240 VAC manual transfer switch with EMG plug. Reserve

battery power greater than or equal to 8 hours

Tok 41 Mile CSA DC line powered from Chistochina. Reserve battery power greater than or

equal to 8 hours

Tok 44 Mile CSA Transfer switch mounted next to power unit, manual transfer switch.

Reserve battery power greater than or equal to 8 hours

Tok 52 Mile Grizzly CSA DC line powered from Slana microwave site. Reserve battery power

greater than or equal to 8 hours

Tok 61.5 Mile Ahtell CSA DC line powered from Slana Microwave site. Reserve battery power

greater than or equal to 8 hours

Tok 64 Mile Porcupine CSA Transfer switch mounted next to power unit, manual transfer switch.

Reserve battery power greater than or equal to 8 hours

Tok 67 Mile Carlson Ck CSA Transfer switch mounted next to power unit, manual transfer switch.

Reserve battery power greater than or equal to 8 hours

Tok 71 Mile Nan Dooley CSA Transfer switch mounted next to power unit, manual transfer switch.

Reserve battery power greater than or equal to 8 hours

Slana Microwave Standby generator on site. Building, 120 / 240 auto transfer, 12KW diesel

generator with 125 gallon on site fuel storage battery plant chargers are 240 VAC emergency run time approximately one week with full capacity

tank. Reserve battery power greater than or equal to 8 hours

Slana DOT Building, 120 / 240 VAC manual transfer switch with EMG plug. Reserve

battery power greater than or equal to 8 hours

College Road CSA Building, 120 / 240 VAC manual transfer switch with EMG plug. Reserve

battery power greater than or equal to 8 hours

Mentasta Pass Building, 120 / 240 VAC EMG plug. Reserve battery power greater than or

equal to 8 hours

Wood Way/Corbin CSA AFC/120 cabinet, 120 volt. Reserve battery power greater than

or equal to 8 hours.

Acres CSA AFC/120 cabinet, 120 volt. Reserve battery power greater than

or equal to 8 hours.

SERVs CSA Adtran 1124P, Span/LPU, reserve battery greater than or equal

to 8 hours.

Gulkana CSA Adtran 1124P, Span/LPU, reserve battery greater than or

equal to 8 hours.

Terrace Dr CSA Adtran 1124P, Span/LPU, reserve battery greater than or

equal to 8 hours.

132 Rich CSA Adtran 1124P, Span/LPU, reserve battery greater than or

equal to 8 hours.

105.5 Rich CSA Adtran 1124P, Span/LPU, reserve battery greater than or

equal to 8 hours.

## Network Interface Devices (NIDs)

CVTC has 3,883 access lines as of 12/31/13 with metallic (copper) connections to the Central Office and their NIDs are powered from the Central Office.

CVTC has 3 access lines as of 12/31/13 with non-metallic (fiber optic) connections to the Central Office. These customers' NIDs are battery powered in case of emergency. The batteries are rated at 8 hours with constant use.

## Ability to reroute traffic around damaged facilities:

**CVTC** has deployed various redundant facilities between its exchanges and interconnecting companies AT&T, GCI and ACS for further toll switching. These redundant facilities are in the form of SONET rings, collapsed SONET rings, and electronic equipment hardware sparing with some alternate physical facilities between Copper Valley Telephone, AT&T and ACS, its interconnection to the Public Switched Telephone Network.

Additionally, data traffic is routed from Valdez to Anchorage on a SONET ring which provides a diversified path should one route become interrupted.

## Capability to manage traffic spikes resulting from emergency situations

Copper Valley Telephone Chitina exchange <CHTNAKXADS1> has 59 access lines/customers, switching capacity of 10,000 on-switch simultaneous calls, and transport capacity for 12 simultaneous calls off switch.

Copper Valley Telephone Tatitlek exchange <TTLKAKXA325> has 41 access lines/customers, switching capacity of 10,000 on-switch simultaneous calls, and transport capacity for 12 simultaneous calls off switch.

Copper Valley Telephone Mentasta exchange <MNTSAKXADS1> has 49 access lines/customers, switching capacity of 10,000 on-switch simultaneous calls, and transport capacity for 12 simultaneous calls off switch.

Copper Valley Telephone Valdez exchange <VLDZAKXA835> has 2,148 access lines/customers, switching capacity of 10,000 on-switch simultaneous calls, and transport capacity for 96 simultaneous calls off switch.

Copper Valley Telephone Glennallen exchange <GLALAKXA822> has 1,556 access lines/customers, switching capacity of 10,000 on-switch simultaneous calls, and transport capacity for simultaneous 96 calls off switch

Copper Valley Telephone McCarthy exchange <MCCRAKXADS1> has 33 access lines/customers, switching capacity of 64 on-switch simultaneous calls, and transport capacity for simultaneous calls 18 off switch.

Copper Valley takes no responsibility for the capabilities of interconnected networks to manage traffic spikes resulting from emergency situations, but will continue its best efforts for its network during such events.

	ce Offerings including Voice Rate Data ection Form		FCC Form 481  OMB Control No. 3060-0986/QMB Control No. 3060-0819 July 2013
<010>	Study Area Code	613006	
<015>	Study Area Name	COPPER VALLEY TEX	
<020>	Program Year	2015	
<030>	Contact Name - Person USAC should contact regarding this data	Pamia R. Murphy	
<035>	Contact Telephone Number - Number of person identified in data line <030>	9078352231 ext.7721	
<039>	Contact Email Address - Email Address of person identified in data line <030>	pmurphy@cute.org	

13.45

<703>

<702> Single State-wide Residential Local Service Charge

	<a2></a2>	<a3></a3>		Residential Local	<b3></b3>	<b4></b4>	<bs></bs> <bs></bs> Mandatory Extended Area	<b>(0)</b>
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Service Rate	State Subscriber Line Charge	State Universal Service Fee	Service Charge	Total per line Rates and Fe
K	Mentasta		PR	13.45	4,25	1.65	5.0	19.35
K	Tatitlek		FR	13,45	4.25	1,65	0.0	19_35
K	McCarthy		FR	13.45	4.25	1.65	0.0	19.35
K	Glennallen		FK	12.45	4.25	1,65	0.0	19.15
K	Chitina		FR	13.45	4.25	4. 63	0.0	13.35
K	Valdez		PR.	13.45	4.25	1.65	0.0	19,35
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								-
				-				

<010>	Study Area Code	623006
<015>	Study Area Name	COPPER VALLEY VEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Panla R. Murphy
<035>	Contact Telephone Number - Number of person identified in data line <030>	907335223J ext.7721
<039>	Contact Email Address - Email Address of person identified in data line <030>	princhy@evic.org

<711>	<a1></a1>	<a2></a2>	<b1></b1>	<b2></b2>	<c> <d1></d1></c>	<d2></d2>	> <d3></d3>	(= 1	<d4></d4>	
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	A STATE OF THE PARTY OF THE PAR	Broadband Service -Upload Speed (Mbps;	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}	

Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees		Di Cadabana Ser rice	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}
Mentasta	149,95	0.0	149.35	30.0	1.0	9999999.9	Olher, Unlimited
Tatitlek	149.95	5.0	149.95	10.0	1.0	9999999.9	Other, Unlimited
Glennallen	149.95	0.0	143.95	10.0	1.0	1999199,3	Other, Unlimited
Chitina	149.95	0.0	149.95	10,0	1.0	9999999.3	Other, Unlimited
Valdez	149.95	0.0	149.95	10.9	1.0	9993999_9	Ciber, Unlimited
Mentasta	159.95	0,0	159,95	15.0	1.0	9999999.9	Other, Unlimited
Tatitlek	139.95	0.0	159.95	15.0	1.0	9999993,9	Other, Unlimited
GlephalJen	159.95	0.0	159.95	75.0	1.0	99059993.5	Other, Unlimited
Chitina	139.95	0.0	159.35	15.0	1.0	9999939.5	Other, Unlimited
Valdez	159,95	0.0	159.95	35.0	1.0	3999399.9	Other, Unlimited
Mentasia	189.95	0.0	169.95	16.0	1.0	9999999,3	Other, Unlimited
Tatitlek	163.95	0.0	189.95	15.0	1.0	9999999.3	Other, Unlimited
Slennallen	169.95	0.0	189.95	18.0	1.0	9999999.9	Other, Unlimited
Chitina	189,95	0.0	163.95	18.0	1.0	9999999_9	Cther, Unlimited
Valde2	189.95	0.0	189.95	18.0	1.0	9999999.9	Other, Unlimited
	Mentasta Tatitlek Glemmallen Chitina Valdez Mentasta Tatitlek Glemmallen Chitina Valdez Mentasta Tatitlek Glemmallen Chitina	Rate	Mentasta         149.95         0.0           Tatitlak         149.95         0.0           Glebhallen         149.95         0.0           Chitina         149.95         0.0           Valdez         149.95         0.0           Mentasta         159.95         0.0           Tatitlex         139.95         0.0           Glebhallet         159.91         0.0           Chitina         159.95         0.0           Valdez         158.95         0.0           Mestasta         189.95         0.0           Tatitlek         189.95         0.0           Slennallen         169.95         0.0           Chitina         189.95         0.0	Exchange (ILEC)         Rate         Fees         and Fees           Mentasta         149.95         0.0         149.95           Tatitlek         149.95         0.0         149.95           Glennalien         149.95         0.0         149.95           Chitina         149.95         0.0         149.95           Valdez         149.95         0.0         149.95           Mentasta         159.95         0.0         159.95           Glennalien         159.95         0.0         159.95           Glennalien         159.95         0.0         159.95           Valdez         159.95         0.0         169.95           Mentasta         189.95         0.0         169.95           Tatitlek         169.95         0.0         189.95           Chitina         169.95         0.0         169.95           Chitina         189.95         0.0         169.95	Exchange (ILEC)         Rate         Fees         and Fees         Download Speed (Mbps)           Mentasta         149.95         3.0         149.95         20.0           Tatitlek         149.95         0.0         149.95         10.0           Glennallen         149.95         0.0         143.95         10.0           Chitina         149.95         0.0         149.95         10.0           Valdez         149.95         0.0         149.95         10.0           Xentasta         159.95         0.0         159.95         15.0           Tatitlek         159.95         0.0         159.95         15.0           Glennallen         159.95         0.0         159.95         15.0           Valdez         159.95         0.0         159.95         15.0           Wentasta         189.95         0.0         169.95         16.0           Tatitlek         189.95         0.0         189.95         18.0           Glennallen         169.95         0.0         189.95         18.0           Chitina         189.95         0.0         189.95         18.0           Chitina         189.93         0.0         169.95	Name	Exchange (ILEC)         Rate         State Regulated Fees         Download Speed (Mbps)         Upload Speed (Mbps)         GB           Mentaste         149.95         0.0         149.95         20.0         1.0         999999.9           Tatitlek         149.95         0.0         149.95         10.0         1.0         999999.9           Clonallen         149.95         0.0         149.95         10.0         1.0         999999.9           Chitina         149.95         0.0         149.95         10.0         1.0         999999.9           Valdez         149.95         0.0         149.95         10.0         1.0         999999.9           Valdez         149.95         0.0         149.95         10.0         1.0         9999999.9           Variate         159.95         0.0         159.95         15.0         1.0         9999999.9           Tatitlek         159.95         0.0         159.95         15.0         1.0         9999999.9           Chitina         159.95         0.0         159.95         15.0         1.0         9999999.9           Mentasta         189.95         0.0         189.95         18.0         1.0         9999999.9 <tr< td=""></tr<>

(800) Operating Companies		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
PURSUIT SHEET HAVE NOW		July 2013

<010>	Study Area Code		613006
<015>	Study Area Name		COPPER VALLEY TEL
<020>	Program Year		2015
<030>	Contact Name - Person I	USAC should contact regarding this data	Pamla R. Murphy
<035>	Contact Telephone Num	ber - Number of person identified in data line <030>	9078352231 ext.7721
<039>	Contact Email Address -	Email Address of person identified in data line <030>	pmurphy@cvtc.org
<810>	Reporting Carrier	Copper Valley Telephone Cooperative, Inc.	
<811>	Holding Company	Copper Valley Telephone Cooperative, Inc.	
<812>	Operating Company	Copper Valley Telephone Cooperative, Inc.	

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	Affiliates	SAC	Doing Business As Company or Brand Designation
1	Copper Valley Telephone Cooperative, Inc.	613006	dba: Copper Valley Telecom (brand designation)
-	Copper Valley Wireless, LLC.	619006	fka: Copper Valley Wireless, Inc.
-	Copper Valley Solutions, LLC.		dba: Copper Valley Internet
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Copper Valley Telephone Cooperative, Inc.

SAC: 613006

LINE 920 - TRIBAL ENGAGEMENT

Attached you will find records of discussions between Copper Valley Telephone Cooperative, Inc. d/b/a Copper Valley Telecom and various tribal councils within our Study Area.

#### Meeting Record: August 13, 2013, 11AM, Gulkana Community Center

## Copper Valley Telecom Present (Name/Title)

- Dave Dengel, CEO
- Tabitha Gregory, CCRO

#### Tribai Organization Leadership Present (Name/ Title)

- Gulkana Village Council
  - Angela Vermillion, Tribal Administrator
  - Sandra Tsimmie (Teen Center staff)
  - o Eveline Frank (Bookkeeper)
  - Monica Sanford (Staff)

#### Introduction

After introductions, Dave provided an overview of the purpose for the meeting, including a brief description of the FCC regulations and requirements to consult with Tribal organizations.

#### Discussion Points:

## 1. Needs Assessment & Deployment Planning

The group reported that a heating pellet plant is being finished now. It is likely that this facility will need a phone line. We will ensure that our plant superintendant is aware of the project. A new community center is being planned for a location near the current village office/community center. Angela reported that she is working on developing funding for the facility. There is currently no established timeline for construction.

Staff members reported that one issue reported last year remains a problem.

a. Sandra and others are unable to make or receive cell phone calls from inside the teen center. After the meeting, we researched our communications and determined that we had tried a yagi antenna and it did not fix the problem. We then worked on a recommendation for a new booster/interior antenna when we lost touch with staff about this issue. We will pick this up again and continue to work the problem.

## 2. Feasibility and Sustainability Planning

## Recent upgrades and improvements in Gulkana village:

 Installing a fiber optic node at the village entrance, this will greatly shorten the loop lengths allowing for DSL speeds up to 18 MEG in the village for those who would like more bandwidth

## **Anticipated Future Projects**

- Annual routine cable and fiber maintenance as required
- 4G LTE upgrade to some cell sites in the Copper Vailey in 2014

## 3. Marketing in Culturally Sensitive Manner

Dave asked the group if there were ways that we could communicate more effectively with the community and council staff about services, promotions, and other information.

We reported that Lifeline re-certifications are going in the mail now and requested assistance in getting the word out on the importance of responding to the re-certification letters coming in the mail.

The group suggested scheduling a day to help community members fill out Lifeline paperwork.

Additionally, they suggested partnering with the Copper River Basin Housing Authority to distribute information about Lifeline (this organization coordinates energy assistance). Also, CRNA routinely visits communities to assist with paperwork.

# 4. Rights of Way, Permitting

Dave asked if there were any pending or known right-of-way or permitting issues and those present responded that they did not know of anything.

#### Meeting Record: August 13, 2012, 9:30am

#### Copper Valley Telecom Present (Name/Title)

- Dave Dengel, CEO
- Tabitha Gregory, CCRO

#### Tribal Organization Leadership Present (Name/ Title)

- Gakona Village Council
  - Charlene Nollner, Tribal Administrator

#### Introduction

After introductions, Dave provided an overview of the purpose for the meeting, including a brief description of the FCC regulations and requirements to consult with Tribal organizations.

#### **Discussion Points:**

#### 1. Needs Assessment & Deployment Planning

Charlene reported that the project to expand the existing clinic building to house village offices is nearly completed. She expects that the offices will be moving from the current rented building to the new facility within 8-12 weeks. Orion Contracting is the primary contractor on the job. She reported that there will also be a new garage built near the facility, but she doesn't believe that they will need any phone or internet services there. Dave suggested that we will have our plant superintendant consider if we should install conduit to the garage in case the Village wishes to have services there later. Charlene indicated that they may want to bump up OSL speeds when they move to the new facility.

Charlene asked if there will be 4G LTE services in the village in 2014 and Dave responded that plans are not yet complete regarding which of the sites will be upgraded to 4G.

#### 2. Feasibility and sustainability Planning

Dave reported to the board the following information regarding recent and planned capital projects that have/would impact the community:

## **Current Projects**

 2013 project is currently underway to upgrade the electronics in the Gakona CSA to a newer IP service platform that will provide area residents more reliable and secure internet and voice service.

#### Planned Future projects

- 2014, Install local CSA site near village office to reduce copper loop length and improve DSL speed offerings
- Install local fiber backbone to Gakona Village offices to provide for high bandwidth offerings
- Annual fiber and copper maintenance as required
- 4G LTE upgrades to some cell sites in the Copper Valley.

#### 3. Marketing in Culturally Sensitive Manner

Dave asked if there were ways that we could communicate more effectively with the community and council staff about services, promotions, and other information.

Charlene reported that she feels the best and most effective means is to take advantage of the opportunity when a customer is on the phone or in the office for any reason. She said this has been most

effective for her personally and said that is almost always how she hears about promotions and new products. She said the CSRs do a very good job with this approach.

We also reported that Lifeline re-certifications are going in the mail now and requested assistance in getting the word out on the importance of responding to the re-certification letters coming in the mail.

## 4. Rights of Way, Permitting

Dave asked if there were any pending or known right-of-way or permitting issues and the Charlene responded that she did not know of anything. She said any right-of-way questions for the CSA site would be handled by Joe Bovee at Ahtna.

## Meeting Record: June 26, 2013, 1:30pm

#### Copper Valley Telecom Present (Name/Title)

- Dave Dengel, CEO
- Tabitha Gregory, CCRO
- · Mitch, Senior Manager for Telecom

## Tribal Organization Leadership Present (Name/ Title)

- Mentasta Traditional Council
  - o Angie David, Tribal Administrator
  - o Donna Pennington, Admin Assistant

#### Introduction

After introductions, Dave provided an overview of the purpose for the meeting.

#### **Discussion Points:**

## 1. Needs Assessment & Deployment Planning

Angie reported that the Village is continuing to work on the new clinic facility. Along with clinic and health offices, the facility will house a distance education room, the ICWA office and behavioral health office. The Tribal administration offices will remain where they are now. They are expecting to move into the facility in October 2013.

## 2. Feasibility and sustainability Planning

Dave reported that the telecommunications facilities are largely built out in Mentasta, and thus future projects are primarily related to maintenance of existing plant. He reported that there are no immediate plans for upgrading the Mentasta cell site to 4G LTE. Mitch and Tabitha mentioned that CVT is bidding on the telecommunications services for the new clinic building.

#### 3. Marketing in Culturally Sensitive Manner

Dave asked the council members if there were ways that we could communicate more effectively with the community and council staff about services, promotions, and other information.

Angle and Donna Indicated that they'd heard there was a good turn out at the March visit by CVT CSRs. They indicated some people had re-established the Life Line credits. Donna indicated that there may be incorrect information provided by some CSRs about a deposit requirement. Tabitha agreed to review this issue and re-distribute information about lifeline qualifications and requirements.

#### 4. Rights of Way, Permitting

Dave asked if there were any pending or known right-of-way or permitting issues and the Angle responded that she did not know of anything. Dave and Angle discussed the recent renewal of our lease for the CO site in Mentasta.

# Meeting Record: June 14, 2013, 1pm

# Copper Valley Telecom Present (Name/Title)

- Dave Dengel, CEO
- Lon Rake, Valdez Plant Supervisor
- Sam Chavez, Engineer

# Tribal Organization Leadership Present (Name/Title)

- Tatitlek Village Council
  - o Vicky Vlasoff, Tribal Administrator
  - o David Totemoff, Council Member/President
  - o Gwen Vlasoff, Staff
  - o Curtis Kompkoff, Staff

#### Introduction

After introductions, Dave provided an overview of the purpose for the meeting.

#### **Discussion Points:**

## 1. Needs Assessment & Deployment Planning

Village staff and council discussed plans for a new NPRHA house and a conversion of an existing house to a "Kelly House" which will contain the post office and a safe place for children. David showed Lon the location of both. The village will contact Lon when they are ready for CVTC to perform the work.

We also discussed DSL speeds. Staff Indicated that residents are noticing slower speeds during certain hours. Sam explained this is due to the size of the Internet pipe serving the village. CVT will look into increasing the size of the pipe.

#### 2. Feasibility and sustainability Planning

Dave reported about the 4G/LTE upgrade scheduled for 2013. Dave reported that CVTC's other plans for the foreseeable future are for ongoing operations and maintenance of existing facilities because the facilities are now built out with fiber.

#### 3. Marketing in Culturally Sensitive Manner

Dave asked the council members if there were ways that we could communicate more effectively with the community and council staff about services, promotions, and other information.

Village staff Indicated no improvements were needed in this area.

### 4. Rights of Way, Permitting

Dave asked if there were any pending or known right-of-way or permitting issues and the David and Vicky responded that they did not know of anything.

# Meeting Record: 12/20/13, 10am

# Copper Valley Telecom Present (Name/Title)

- Dave Dengel, CEO
- Tabitha Gregory, CCRO

# Tribal Organization Leadership Present (Name/Title)

- Cheesh'na Village Council
  - o Karen Linnell,
  - o Wilson Justin, Staff
  - o Joan, Tribal Council Board Member
  - o Chris Winter, Tribal Council Board Member
  - o Cecil Sanford, Tribal Council Board Member

## Introduction

After introductions, Dave provided an overview of the purpose for the meeting, including a brief description of the FCC regulations and requirements to consult with Tribal organizations.

#### **Discussion Paints:**

#### 1. Needs Assessment & Deployment Planning

The group reported that the washeteria is under construction now. It is located near the current village offices and will probably not need its own telephone line. The group also reported that a wood chip boiler is planned for construction in the spring. It will be a self-contained unit used to heat the council offices/buildings and may need a telephone line for monitoring equipment. They also reported that the road is in place now for the 25-lot subdivision. Dave asked that the staff keep our Glennallen office in the loop about construction and installation of electrical services in the subdivision because we would probably want to coordinate our installation with AP&T. Staff requested an as-built for the Council facilities.

#### 2. Feasibility and sustainability Planning

Dave reported to the board the following information regarding recent and planned capital projects that have/would impact the community:

Recent upgrades and improvements in Cheesh'na village:

 In 2013 we placed fiber to the new Chistochina Health Clinic and Installed the telephone system in the clinic. The Ethernet circuit will be turned up in January 2014 and provide a pathway to the Alaska Native Medical Clinic in Anchorage.

## Planned Future projects

Routine maintenance is planned for the future.

## 3. Marketing in Culturally Sensitive Manner

Dave asked the council members and staff if there were ways that we could communicate more effectively with the community and council staff about services, promotions, and other information.

The group did not present any specific recommendations.

4. Rights of Way, Permitting NA

## Meeting Record: December 13, 2013, 2pm (via teleconference)

## Copper Valley Telecom Present (Name/Title)

- Dave Dengel, CEO
- Tabitha Gregory, CCRO

# Tribal Organization Leadership Present (Name/Title)

- Kluti-Kaah Village staff member
  - Michelle Bayless-Jackson, Tribal Administrator

#### introduction

After introductions, Dave provided an overview of the purpose for the meeting, including a brief description of the FCC regulations and requirements to consult with Tribal organizations.

#### **Discussion Points:**

## 1. Needs Assessment & Deployment Planning

Michelle reported that the Village continues to seek funding for completion of the community center. There is new housing planned for a location near the Copper Center ball park or on Hector Ewan Road. This is managed through the Housing Authority. She also Indicated that the old CRNA clinic building will be removed in the spring now that the new clinic is finished. Michelle indicated that she has proposed that new larger apartments be constructed on the site, but that is not an approved or firm project yet.

We asked that they keep us abreast of these projects as they develop so that we can ensure timely installation / moves of telecommunications needs.

## 2. Feasibility and sustainability Planning

Dave reported to the board the following information regarding recent and planned capital projects that have/would impact the community:

- Copper Valley sites will be upgraded to 4G LTE in 2014.
- We plan to install local fiber backbone from Silver Springs to Kluti Kaah offices and develop a new CSA to provide for future increased bandwidth offers.
- Annual maintenance to our facilities and plant.

## Marketing in Culturally Sensitive Manner

Dave asked the if there were ways that we could communicate more effectively with the community and council staff about services, promotions, and other information.

- Michelle indicated that she would be open to hosting us at a Lifeline sign up event at the Hall and that she would also distribute Lifeline materials at the Hall.
- She expressed concern about the CSRs referring customers to the Help Desk particularly for issues such as reporting SPAM.
- Michelle asked for information regarding Cloud services.

# Rights of Way, Permitting

NA

# Meeting Record: August 29, 9am, Tazlina Office

# Copper Valley Telecom Present (Name/Title)

- Dave Dengel, CEO
- Tabitha Gregory, CCRO
- Shilah Butler, Senior Manager, Affiliates

## Tribal Organization Leadership Present (Name/Title)

- Tazlina Village staff members
  - Rick Young, Tribal Administrator
  - o Greg Engebretson, Tribal Transportation Program
  - o Dorothy Shinn, President of the Council
  - Vanessa Goodlataw, Environmental Coordinator
  - o Marce Simeon, ICWA & accounts payable

#### Introduction

After introductions, Dave provided an overview of the purpose for the meeting, including a brief description of the FCC regulations and requirements to consult with Tribal organizations.

### **Discussion Points:**

## 1. Needs Assessment & Deployment Planning

The group reported that there will be some staff members who relocate from the current clinic over to the CRNA clinic when that facility is completed, but the staff members are not Tazlina Village staffer – they are employed by CRNA. They also indicated that a new community hall is still in the planning stages for a location on Old School Road, but funding is still being developed and there's not a timeline yet. They indicated that the existing community center will continue to be used for staff offices (they have a growing number of staff members, so expect to need the space).

We asked that they keep us abreast of these projects as they develop so that we can ensure timely installation / moves of telecommunications needs.

## 2. Feasibility and sustainability Planning

Dave reported to the board the following information regarding recent and planned capital projects that have/would impact the community:

## Recent upgrades and improvements in Tazilna village:

 2010 upgraded copper facilities in along Old School Rd. to provide service to new housing (\$26,000)

- Installed new local fiber optic cable along the Highway passing by Tazlina Village offices. (\$68,000)
- Installed fiber optic backbone fiber to provide future bandwidth requirements for the new clinic (\$64,000)

## **Anticipated Future Projects**

- 1. Install local fiber backbone from Tazlina Village offices to provide for high bandwidth offerings (\$55,000)
- 2. Establish a CSA site in Village to shorten loop Lengths to provide for higher DSL speed offerings (\$52,000)
- 3. 4G LTE network build out.

## Marketing in Culturally Sensitive Manner

Dave asked the council members and staff if there were ways that we could communicate more effectively with the community and council staff about services, promotions, and other information.

In response to this area, the group mainly discussed questions about pricing for wireless services, including data plans.

## Rights of Way, Permitting

Dave asked if there were any pending or known right-of-way or permitting issues and the group responded that they did not know of anything.

## Meeting Record, December 11, 2013 10am (via teleconference)

## Copper Valley Telecom Present (Name/Title)

- Dave Dengel, CEO
- Tabitha Gregory, CCRO

# Tribal Organization Leadership Present (Name/Title)

Chitina Village

Judy Block, Tribal Administrator

#### Introduction

After introductions, Dave provided an overview of the purpose for the meeting, including a brief description of the FCC regulations and requirements to consult with Tribal organizations.

#### **Discussion Points:**

## 1. Needs Assessment & Deployment Planning

Judy reported that there has been a decision to not move the clinic from its current location to the village. It will remain where it is (last year, it was reported that they were considering this option). There may be some upgrades to services in the future. Also, the Housing Authority is planning to build 3 new houses at the village this summer (2014). Additionally, there will be 2 "FEMA" trailers that will be placed permanently at the village for a safe house and to house employee/s.

## 2. Feasibility and sustainability Planning

Dave reported the following information regarding recent and planned capital projects that have/would impact the community:

- A. In 2014, we will be upgrading cell sites in the Copper Valley, including the Chitina site, to 4G LTE.
- B. In 2014, we are planning to replace the aging Chitina CO back up battery.
- C. There is a planned upgrade to the Chitina CO network and additional support for the Metaswitch.
- We are planning to upgrade the Chitina airport cabinet to Adtran broadband network.
- E. Routine maintenance of plant and facilities over the next 5 years.

## 3. Marketing in Culturally Sensitive Manner

Dave asked if there were ways that we could communicate more effectively with the community and council staff about services, promotions, and other information.

Judy said posters in Chitina are the best way to disseminate information. She also felt that the same ads that are mailed in bills could be posted on the on-line accounts pages of our website. Judy said she would volunteer to post flyers if we send them directly to her.

4. Rights of Way, Permitting NA

According to the Pepervork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0572-0031. The time required to complete this information collection is estimated to average 4 hours per response, including the time for reviewing instructions,

## ABSETS   DURN'S TREE PERIOD COVERATION   PROFIT   PRO	searching existing data sources, gathering and maintaining	the data needed, and con	pleting and reviewing	the collection of information.		
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS   Copper Yalley Telephone Cooperative, Inc.	USDA-RUS					
## Compact Valley Telephone Cooperative, Inc.    Copper Valley Telephone Cooperative, Inc.   Copper Valley Te						
### TELECOMMUNICATIONS BORROWERS    Prepared with Audited Data				BORROWER NAME		
ACRESTICATIONS Colour Proport on PLS SIANDA 19 along of the river of the protest			s	Copper Valley Telephone Cooperative, Inc.		
Prescription   Pres				(Prepared with Audited Data)		
## Description of the entries in this report are in accordance with the accordance of the pattern and reflect the situate of the system to the best of run Honorleage and belief, ALL INSURANCE REQUIRED BY YERF ARX 1788, CHAPTER XVII, RUS, WAS IN FORCE DURING THE REPORTING PERIOD AND REVENUES HAVE BEEN OBTAINED FOR ALL POLICIES.  ### DURING THE PERIOD COVERED BY THIS REPORT PUNSUANT TO PART 1788 OF 7CFR CHAPTER XVII Cheek one of the following:  ### DURING THE PERIOD COVERED BY THIS REPORT PUNSUANT TO PART 1788 OF 7CFR CHAPTER XVII Cheek one of the following:  ### DAY 10 English and another inspects.  ### DAY 11 English and another inspects.  ### DAY 12 English and the soligishore were strength of the obligations under the RUS been accounted to the following:  ### DAY 12 English and the obligations under the RUS been accounted to the following:  ### DAY 12 English and the soligishore were strength of the obligations will be the following sentitively described in the Telecon Operating Report  ### DAY 12 English and The Telecon Operating Report  ### DAY 12 English and The Telecon Operating Report  ### DAY 12 English and The Telecon Operating Report  ### DAY 12 English and The Telecon Operating Report  ### DAY 12 English and The Telecon Operating Report  ### DAY 12 English and The Telecon Operating Report  ### DAY 12 English and The Telecon Operating Report  ### DAY 12 English and The Telecon Operating Report  ### DAY 12 English and The Telecon Operating Report  ### DAY 12 English and The Telecon Operating Report  ### DAY 12 English and The Telecon Operating Report  ### DAY 12 English and Telecon Operating Report  ### DAY 12 English and The Telecon Operating Report  ### DAY 12 English and The Telecon Operating Report  ### DAY 12 English and The Telecon Operating Report  ### DAY 12 English and Telecon Operating Report  ### D	INSTRUCTIONS-Submit report to RUS within 30 d	ays after close of the pe	riod.	PERIOD ENDING	BORROWER DESIGNATION	
We have by certify that the earnies in this report are in accordance with the occounts and other records of the option and region in an accordance with the occounts and other records of the potential or in a the last of in a minuted piece.	For detailed instructions, see RUS Bulletin 1744-2.	Report in whole dollar	s only.	December, 2013	AK0509	
## All of the adiquitions under the RTUS ison documents have been fulfilled in all material respects.  ## David Denge1    20/31/2014	to the bust of our knowledge and belief. ALL INSURANCE REQUIRED BY RENEWALS HAVE BEEN OBTAIN	7 CFR PART 1788, ED FOR ALL POI	dance with the acc CHAPTER XVI LICIES.	ounts and other records of the system and reflect the sta I, RUS, WAS IN FORCE DURING THE REPORTI	NG PERIOD AND	
Pavid Dengel   2/3/31/2014   Dengel   2/3/3	DURING THE PERI	OD COVERED BY			XVII	
DATE	All of the obligations under the RUS loan denote have been fulfilled in all material respects.	ocuments		under the RUS loan documents. Said default(s) is/s	re en	
BALANCE   BALA	David Dengel		3/31/2014			
ASSETS PRIOR YEAR ASSETS CURRENT LABILITIES AND STOCKHOLDERS' EQUITY PRIOR YEAR ASSETS 1. Cash and Equivalents 1. (1, 136, 293) 12, 505, 548 85, Accounts Payable 3. Affiliates: 2. Cash-RUS Construction Fund 8. Affiliates: 3. Affili			DATE	•		
ASSETS PRIOR YEAR ASSETS CURRENT LABILITIES AND STOCKHOLDERS' EQUITY PRIOR YEAR ASSETS 1. Cash and Equivalents 1. (1, 136, 293) 12, 505, 548 85, Accounts Payable 3. Affiliates: 2. Cash-RUS Construction Fund 8. Affiliates: 3. Affili			PART	A. BALANCE SHEET		
ASSETS PRIOR YEAR SND OF PERIOD CURRENT LABILITIES AND STOCKHOLDERS' EQUITY PRIOR YEAR END OF PERIOD CURRENT LABILITIES CURRENT LABILITIES (CARP and Equivalents 10, 136, 293 12, 505, 546 25. Accounts Payable 3, 014, 040 2, 324, 360 25. Accounts Payable 3, 014, 040 2, 324, 360 26. Accounts Receivable 3, 518, 227 26. Notes Payable 3, 014, 040 2, 324, 360 26. Accounts Receivable 3, 558, 279 3, 031, 250 29. Current Mail LTD Debt 1, 2, 639, 898 1, 671, 670 27. Advance Billings and Payments 354, 472 365, 422		BALANCE			BALANCE	BALANCE
Current LABILITIES	ASSETS	PRIOR YEAR	1	LIABILITIES AND STOCKHOLDERS' EQUITY	i .	END OF PERIOD
1. Cash and Equivalents	CURRENT ASSETS	CONTRACTOR OF THE PARTY OF THE				
2. Cash-RUS Construction Fund 3. Affiliates: 3. Second Accounts Receivable 3. 5,58,279 3. 031,260 9. Current Mal. LT Debt 1,693,898 1,673,670 3. Current Mal. LT Debt 1,700,897 3. C	A CONTRACT OF THE PROPERTY OF	10,136,293	12,505,548	The second section of the second seco	3,014,040	2,324,360
3. Affiliates:   27. Advance Billings and Psymenia   38.4, 472   3.65, 423   26. Customer Deposite   35, 153   32, 1767   27. Advance Billings and Psymenia   38.4, 472   3.65, 423   32, 1767   32, 17, 170   33, 170   34,						
a. Telecom, Accounts Receivable   3,558,279 3,031,260 20. Current Mal. L/T Debt   1,693,898 1,871,670   b. Olther Accounts Receivable   2,744,000 2,497,397 30. Current Mal. L/T Debt Riv. Dev.   1,693,898 1,871,670   c. Notes Receivable   920,568 1,003,577 32. Income Taxes Accound   459,897 445,592   c. Notes Receivable   2,901,444 1,162,455 3		JERICHERON.	THE R. P. LEWIS CO., LANSING, MICH.		384,472	385,423
D. Olfrer Accounts Receivable   3,558,279   3,031,260   2, Current Mail, LT Debt. Rur. Dev.   1,693,898   1,871,670   2,497,397   30. Durrent Mail, LT Debt. Rur. Dev.   1,693,898   1,871,670   2,497,397   30. Durrent Mail, LT Debt. Rur. Dev.   1,693,898   1,871,670   2,497,397   30. Durrent Mail, LT Debt. Rur. Dev.   1,693,898   1,871,670   2,497,397   30. Durrent Mail, LT Debt. Rur. Dev.   1,693,898   1,871,670   2,497,397   30. Durrent Mail, LT Debt. Rur. Dev.   1,693,898   1,871,670   2,497,397   30. Durrent Mail, LT Debt. Rur. Dev.   1,693,898   1,871,670   30. Durrent Mail, LT Debt. Rur. Dev.   1,693,898   1,871,670   30. Durrent Mail, LT Debt. Rur. Dev.   1,693,898   1,871,670   30. Durrent Mail, LT Debt. Rur. Dev.   1,693,898   1,871,670   30. Durrent Mail, LT Debt. Rur. Dev.   1,693,898   1,871,670   30. Durrent Mail, LT Debt. Rur. Dev.   30. Durrent Mail, LT Debt. Rur. Dev.   30. Durrent Mail, LT Debt. Rur. Dev.   30. Durrent Rurent Rurent Rur. Dev. R		Thursday, per age on war.	Same directly but by our constitution			
C. Notes Receivable 2, 744,000 2, 497,397 30. Current Mat. LTD Debt-Rur. Dev. 4. Non-Affiliates: 1, 100,31577 31. Current Mat. LTD Debt-Rur. Dev. 5. Notes Receivable 920,568 1, 100,31577 32. Current Mat. Capital Leases 4. Capital Leases 5. Capital Leases 6. Capital Lease 6. Capital Leases 6. Capital		3,558,279	3,031,260			
4. Non-Affiliates: a. Telecom, Accounts Receivable b. Other Accounts Receivable b. Other Accounts Receivable c. Notes Receivable c. Notes Receivable c. Notes Receivable d. 1, 162, 455 d. Other Turner Labilities d. 2, 901, 444 d. 1, 162, 455 d. Other Turner Labilities d. 22, 622 d. 1, 154, 299 d. Other Current Labilities (25 thru 34) d. Other Current Labilities d. 22, 622 d. 1, 154, 299 d. Other Current Labilities d. 22, 622 d. 1, 154, 299 d. Other Current Labilities d. 22, 622 d. 1, 154, 299 d. Other Current Labilities d. 22, 622 d. 1, 154, 299 d. Other Current Labilities d. 22, 622 d. 1, 154, 299 d. Other Current Labilities d. 22, 622 d. 1, 154, 299 d. Other Current Labilities d. 22, 622 d. 1, 154, 299 d. Other Current Labilities d. 22, 622 d. 1, 154, 299 d. Other Current Labilities d. 22, 622 d. 1, 154, 299 d. Other Current Labilities d. 21, 093, 313 d. Current Labilities d. 22, 622 d. 1, 154, 299 d. Other Current Labilities d. 21, 093, 314 d. Other Fill Debt RUB d. Purpsyments d. Debt-FIB Notes d. 1, 33, 533 d. Funded Debt-FIB Notes d. 1, 33, 533 d. Funded Debt-FIB Notes d. 1, 33, 533 d. Funded Debt-Other d. Debt-FIB Notes d. 1, 094, 189 d. Funded Debt-Other d. Debt-FIB Notes d.						270.270.0
a. Telecom, Accounts Recalvable 920,568 1,003,577 32. Income Taxes Accrued 459,897 445,592 c. Notes Receivable 2,901,444 1,162,455 33. Other Taxes Accrued 459,897 445,592 5. Interest and Dividende Receivable 34. Other Current Liabilities (25 thru 34) 6,210,282 6,214,111 5. Telecom, Plant-In-Service 88,809,291 9,405,966 51. Cap. Stock Outside 8. Propayment 9. Dividende Pobl-RTIS Notes 17,066,284 13,993,316 8. Prepayments 141,055 140,053 37. Funded Debl-RTIS Notes 613,517 557,743 9. Other Current Assets (17 thru 9) 20,835,772 20,715,887 39. Funded Debl-RTIS Notes 613,517 557,743 9. Other Current Assets (17 thru 9) 20,835,773 20,715,887 39. Funded Debl-RTIS Notes 613,517 557,743 9. Other Current Assets (17 thru 9) 20,835,773 20,715,887 39. Funded Debl-RTIS Notes 613,517 557,743 9. Funded Debl-RTIS Notes 613,517 557,743		A STREET, STRE	OCCUPATION OF PROPERTY OF			-
b. Other Accounts Receivable 2, 901, 444 1, 162, 455 33. Other Taxes Accound 459, 897 445, 592 5. Notes Receivable 34. Other Current Liabilities 628 thru 34) 6, 210, 282 6, 221, 1154, 299 5. Interest and Dividends Receivable 35. Total Current Liabilities (26 thru 34) 6, 210, 282 6, 221, 111 6. Matarial-Regulated 434, 051 374, 716 LONG-TERM DEBT 7. Material-Regulated 8. Prepayments 141, 055 140, 053 37. Funded Debi-RTB Notes 6, 133, 533 5, 714, 671 7. Other Current Assets (17 tru 9) 20, 835, 772 20, 715, 887 38. Funded Debi-RTB Notes 613, 517 557, 743 10. Total Current Assets (17 tru 9) 20, 835, 772 20, 715, 887 38. Funded Debi-RTB Notes 613, 517 557, 743 10. Total Current Assets (17 tru 9) 20, 835, 772 20, 715, 887 38. Funded Debi-Diher 7. Other Long-Term Debi 8. Rural Development 15, 078, 556 19, 715, 741 42. Reacquired Debi 8. Rural Development 1, 094, 189 1, 980, 667 34. Other Long-Term Debi 8. Rural Development 10, 0625 100, 624 48. Total Long-Term Debi (38 thru 45) 23, 813, 334 20, 265, 730 10. Standard Debi-Diher 7. Other Long-Term Debi (38 thru 45) 23, 813, 334 20, 265, 730 10. Dilagalized Investments 48. Other Deferred Circlisis 419, 900 553, 133 10. Dilagalized Investments 48. Other Deferred Circlisis 419, 900 553, 133 10. Dilagalized Investments 48. Other Deferred Circlisis 419, 900 553, 133 10. Dilagalized Investments 48. Other Deferred Circlisis 419, 900 553, 133 10. Dilagalized Investments 48. Other Deferred Circlisis 419, 900 553, 133 10. Dilagalized Investments 48. Other Deferred Circlisis 419, 900 553, 133 10. Dilagalized Investments 49. Other Liabilities and Deferred Circlisis 49. Other Liabilities 419, 900 553, 133 10. Deferred Circlisis 49. Other Liabilities 419, 900 553, 133 10. Deferred Circlisis 49. Other Liabilities 49. Other Lia		A DATE OF THE OWNER OW	ACCUSED OF SCHOOL SERVICES			
C. Notice Receivable   34, Other Current Liabilities   622,822   1,154,299			1,162,455	32. Other Taxes Account	459 897	445 592
S. Interest and Dividends Receivable   35, Total Current Liabilities (25 thru 34)   6, 210, 282   6, 214, 111			-,202,100			
6. Material-Regulated 434,051 374,716 LONG-TERM DEBT 17,066,284 13,993,316 8. Prepayments 141,055 140,053 37. Funded Debl-RIB Notes 6,133,533 5,714,671 9. Other Current Assets (1 Thru 9) 20,835,771 20,715,087 10. Total Current Assets (1 Thru 9) 20,835,771 20,715,087 10. Funded Debl-RIB Notes 613,517 557,743 10. Total Current Assets (1 Thru 9) 20,835,771 20,715,087 10. Funded Debl-RIB Notes 613,517 557,743 10. Funded Debl-RIB Notes 613,517 557 10. Funded Debl-RIB Notes 613,517 557,743 10. Funded Debl-RIB Notes 613,517 557 10. Funded Debl-RIB Notes 613,517 557 10. Funded		4				
7. Material-Nonregulated 8. Prepayments 141,055 140,053 37. Funded Debl-RTB Notes 6,133,533 5,714,671 9. Other Current Assets (1 Thru 9) 20,835,771 20,735,087 38. Funded Debl-RTB Notes 613,517 557,743 19. Tunded Debl-RTB Notes 613,517 557,743 19. Funded Debl-RTB Notes 613,517 557,5		434 051	274 716		0,210,262	The little same
8. Prepayments		434,031	3/4//10		17.066.284	13.993.316
9. Other Current Assets   17 hru e)   20,835,771   20,715,087   38. Funded Debt-Other		141.055	140.053			STATE OF THE PARTY IN COLUM
10. Total Current Assets (1 Thru 9)						
NONCURRENT ASSETS   40. Funded Debt-Rural Develop. Loan   41. Premium (Discount) on L/T Debt   41. Premium (Discount) on L/T Debt   42. Reacquired Debt   42. Reacquired Debt   43. Obligations Under Capital Lease   44. Adv. From Affiliated Companies   44. Adv. From Affiliated Companies   45. Other Long-Term Debt   45. Other Long-Term Debt   46. Other Long-Term Debt   47. Other Long-Term Debt   48. Other Long-Term Debt   48. Other Long-Term Debt   48. Other Long-Term Debt   48. Other Long-Term Debt   49. Other Long-Term Debt   49. Other Jurisdictional Differences   49. Other Jurisdictional Differ		20 835 771	20 715 097		013,517	337,743
## Premium (Discount) on L/T Debt  ## B. Rural Development  ##		20,633,771	20,713,087			
B. Rural Development	CAN SERVICE. ACTION OF STREET, AND AND ACTION OF STREET					-
b. Nonrural Development 1,094,189 1,980,667 43. Obligations Under Capital Lease  2. Other investments 44. Adv. From Affiliated Companies 45. Other Long-Term Debt 55. Other Long-Term Debt 65. Other Long-Term Lease 65. Other Lease 65. Other Long-Term Lease 65. Other Lease 65. Other Long-Term Lease 65. Other Lease 65. Other Long-Term Lease 65. Other Lease 65. Othe		15.078.556	19.715.741			
12. Offier investments  a. Rural Development b. Nonrural Development 100,625 100,624 45. Other Long-Term Debt 23,813,334 20,265,730 713. Nonregulated investments (1,012) (1,212) 714. Other Long-Term Labilities 715. Deferred Charges 716. Jurisdictional Differences 717. Total Noncurrent Assets (11 thru 16) 718. Telecom, Plant-In-Service 719. Property Held for Future Use 720. Plant Under Construction 737. Property Held for Future Use 747. Deferred Charges 758. Additional Paid-In-Capital 759. Additional Deferred Charges 769. Other Subscribed 770. Total Charges 771. Capital Charges 772. Additional Differences 773. Treasury Stock 773. Treasury Stock 774. Other Long-Term Labilities 775. Retained Earnings or Margins 775. Retained Earnings or Margins 777. Other Labilities And Equity (35+48+50+58) 778. Retained Earnings or Margins 778. Property (35+48+50+58)						
8. Rural Development b. Nonrural Development 100, 625 100, 624 48. Total Long-Term Debt (36 thru 45) 23, 813, 334 20, 265, 730 (1, 212) OTHER LIAB. & DEF. CREDITS 419, 900 553, 133 (15. Deferred Charges 48. Other Deferred Credits 49. Other Jurisdictional Differences 49.		Transition and the same	élesesiano America			
b. Nonrural Development 100,625 100,624 46. Total Long-Term Debt (36 thru 45) 23,813,334 20,265,730 (1,212) OTHER LIAB, & DEF. CREDITS 419,900 553,133 (15. Deferred Charges 48. Other Deferred Credits 49. Other Jurisdictional Differences 49. Other Jurisdictional Differen		Thoughout the service services				
13. Nonregulated Investments (1,012) (1,212) OTHER LIAB. & DEF. CREDITS 14. Other Noncurrent Assets 47. Other Long-Term Liabilities 419,900 553,133 15. Deferred Charges 48. Other Deferred Credits 49. Other Jurisdictional Differences 49. Other Jurisdictional Differences 49. Other Jurisdictional Differences 49. Other Jurisdictional Differences 49. Other Liabilities and Deferred Credits (47 thru 48) 419,900 553,133 16. Total Noncurrent Assets (11 thru 16) 16,272,358 21,795,820 50. Total Other Liabilities and Deferred Credits (47 thru 48) 419,900 553,133 17. Total Noncurrent Assets (11 thru 16) 419,900 553,133 18. Telecom, Plant-In-Service 88,809,291 90,405,966 51. Cap. Stock Outstand. & Subscribed 52. Additional Paid-In-Capital 52. Additional Paid-In-Capital 53. Treasury Stock 54. Membership and Cap. Certificales 54. Membership and Cap. Certificales 55. Other Capital 8,019,094 13,154,323 18. Plant Adj., Nonop. Plant & Goodwill 54. Membership and Cap. Certificales 56. Patronage Capital Credits 37,081,470 39,262,675 19. TOTAL ASSETS (10+17+23) 57. Retained Earnings or Margins 8,941,636 8,419,617 18. Total Equity (51 thru 57) 54,042,200 60,836,615 18. Total Equity (51 thru 57) 54,042,200 60,836,615		100 625	100 624		23.813.334	20.265.730
14. Other Noncurrent Assets					CONTRACTOR OF THE	FEB THE SHEET
15. Deferred Charges  18. Other Deferred Credits  19. Unisdictional Differences  19. Other Jurisdictional Differences  10. Total Noncurrent Assets (11 thru 18)  10. 272,358  21. 795,820  20. Total Other Liabilities and Deferred Credits (47 thru 49)  10. Property Heid for Future Use  20. Plant Under Construction  206,643  372,625  372,		(1,012)	(1,212)	1		553,133
16. Jurisdictional Differences  49. Other Jurisdictional Differences  17. Total Noncurrent Assets (11 thru 18)  16,272,358 21,795,820 50. Total Other Liabilities and Deferred Credits (47 thru 49)  419,900 553,133  PLANT, PROPERTY, AND EQUIPMENT  18. Telecom, Plant-in-Services  88,809,291 90,405,966 51. Cap. Stock Outstand. & Subscribed  19. Property Held for Future Use  20. Plant Under Construction  20. Plant Under Construction  21. Plant Adj., Nonep. Plant & Goodwill  22. Less Accumulated Depreciation  41,638,347 45,419,909 55. Other Capital  23. Net Plant (18 thru 21 less 22)  47,377,587 45,358,682 58. Patronage Capital Credits  37,081,470 39,262,675  24. TOTAL ASSETS (10+17+23)  57. Retained Earnings or Margins  8,941,636 8,419,617  58. Total Equity (51 thru 57)  54,042,200 60,836,615	AND DESCRIPTION OF THE PERSON	1				
17. Total Noncurrent Assets (11 thru 16)		+				
PLANT, PROPERTY, AND EQUIPMENT  18. Telecom, Plant-In-Service  19. Property Held for Future Use  20. Plant Under Construction  20. Plant Under Construction  21. Plant Adj., Nonop. Plant & Goodwill  22. Less Accumulated Depreciation  41, 638, 347	Chart than 17 th and 17 th and 17 th and 17 th and 17 th	16 272 350	21 705 920		419 900	553 123
18. Telecom, Plant-In-Service  88,809,291  90,405,966  51. Cap. Stock Outstand. & Subscribed  52. Additional Paid-in-Capital  20. Plant Under Construction  206,643  372,625			21,795,620		\$200 PGE 000 000	
19. Property Held for Future Use 20. Plant Under Construction 20. Plant Under Construction 20. Flant Adj., Nonop. Plant & Goodwill 21. Plant Adj., Nonop. Plant & Goodwill 22. Less Accumulated Depreciation 23. Net Plant (16 thru 21 less 22) 24. TOTAL ASSETS (10+17+23) 25. Additional Paid-in-Capital 26. Additional Paid-in-Capital 27. Membership and Cap. Certificales 28. Membership and Cap. Certificales 29. View Capital 20. Plant (16 thru 21 less 22) 20. Total Assets (10+17+23) 21. Total Assets (10+17+23) 22. Less Accumulated Depreciation 23. Net Plant (16 thru 21 less 22) 24. TOTAL Assets (10+17+23) 25. Total Equity (51 thru 57) 26. Total Equity (51 thru 57) 27. Realined Earnings or Margins 28. Total Equity (51 thru 57) 29. Total Liabilities AND Equity (35+48+50+58)	William I was a second design control and a control of the control	99 800 301	90 ADE 966	- 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1	Participation of the second	ALL INTERNAL CONTRACTOR
20. Plant Under Construction 206, 643 372, 625 53. Treasury Stock 21. Plant Adj., Nonop. Plant & Goodwill 22. Less Accumulated Depreciation 23. Net Plant (18 thru 21 less 22) 24. TOTAL ASSETS (10+17+23) 25. Total Equity (51 thru 57) 26. TOTAL LIABILITIES AND EQUITY (35+48+50+58) 27. Results (18 thru 27) 28. TOTAL LIABILITIES AND EQUITY (35+48+50+58)	The state of the s	00,009,291	50,405,500			
21. Plant Adj., Nonop. Plant & Goodwill  22. Less Accumulated Depreciation  41, 638, 347		206 642	372 625			
22. Less Accumulated Depreciation 41, 638, 347 45, 419, 909 55. Other Capital 8,019,094 13,154,323 23. Net Plant (18 thru 21 less 22) 47,377,587 45,358,682 58. Patronage Capital Credits 37,081,470 39,262,675 24. TOTAL ASSETS (10+17+23) 57. Retained Earnings or Margins 8,941,636 8,419,617 58. Total Equity (51 thru 57) 54,042,200 60,836,615 59. TOTAL LIABILITIES AND EQUITY (35+48+50+58)		200,043	3121023			= 1
23. Net Plant (16 thru 21 less 22) 47,377,587 45,358,682 58. Patronage Capital Credits 37,081,470 39,262,675 24. TOTAL ASSETS (10+17+23) 57. Retained Earnings or Margins 8,941,636 8,419,617 58. Total Equity (51 thru 57) 54,042,200 60,836,615 59. TOTAL LIABILITIES AND EQUITY (35+48+50+58)		41 620 345	4E 430 000		8,019,094	13.154.323
24. TOTAL ASSETS (10+17+23)  57. Retained Earnings or Margins  8,941,636  8,419,617  58. Total Equity (51 thru 57)  54,042,200  60,836,615  59. TOTAL LIABILITIES AND EQUITY (35+48+50+58)						
58. Total Equity (51 thru 57) 54,042,200 60,836,615 59. TOTAL LIABILITIES AND EQUITY (35+48+50+58)		27,577,587	25,550,002			
59. TOTAL LIABILITIES AND EQUITY (35+48+50+58)	E+. 101AL A33E13 (10+1/+23)	1 1				
94 495 716 97 969 599					34,042,200	20,030,015
		84,485,716	87,869,589		84,485,716	87,869,589

#### USDA-RUS

# OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

BORROWER DESIGNATION

AK0509

PERIOD ENDING

INSTRUCTIONS- See RUS Bulletin 1744-2

December, 2013

#### PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS

ITEM	PRIOR YEAR	THIS YEAR	
Local Network Services Revenues	2,565,948	2,476,475	
2. Network Access Services Revenues	18,340,608	17,836,334	
Long Distance Network Services Revenues			
Carrier Billing and Collection Revenues	133,019	136,804	
5. Miscellaneous Revenues	126,714	127,290	
6. Uncollectible Revenues	(8,408)	(1,929)	
7. Net Operating Revenues (1 thru 5 less 6)	21,174,697	20,578,632	
8. Plant Specific Operations Expense	5,694,740	5,701,614	
9. Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)	1,542,564	1,779,843	
10. Depreciation Expense	4,677,366	4,666,838	
11. Amortization Expense			
12. Customer Operations Expense	1,089,011	964,08	
13. Corporate Operations Expense	2,635,840	2,584,19	
14. Total Operating Expenses (8 thru 13)	15,639,521	15,696,575	
15. Operating Income or Margins (7 less 14)	5,535,176	4,882,25	
16. Other Operating Income and Expenses			
17. State and Local Taxes			
18. Federal Income Taxes		666,933	
19. Other Taxes	315,730	303,335	
20. Total Operating Texes (17+18+19)	315,730	970,268	
21. Net Operating Income or Margins (15+16-20)	5,219,446	3,911,989	
22. Interest on Funded Debt	1,364,078	1,116,425	
23. Interest Expense - Capital Leases			
24. Other Interest Expense	25,956	22,630	
25. Allowance for Funds Used During Construction	0		
26. Total Fixed Charges (22+23+24-25)	1,390,034	1,139,059	
27. Nonoperating Net Income	82,662	136,026	
28. Extraordinary items			
29. Jurisdictional Differences			
30. Nonregulated Net Income	5,029,562	5,510,657	
31. Total Nat Income or Margins (21+27+28+29+30-26)	8,941,636	8,419,617	
32. Total Taxes Based on Income	315,655	970,268	
33. Retained Earnings or Margins Beginning-of-Year	7,874,067	8,941,636	
34. Miscellanegus Credits Year-to-Date			
35. Dividends Declared (Common)			
36. Dividends Declared (Preferred)			
37. Other Debits Year-to-Date	4,076,083	5,135,229	
38. Transfers to Patronage Capital	3,797,984	3,806,407	
39. Retained Earnings or Margins End-of-Period [(31+33+34) - (35+36+37+38)]	8,941,635	8,419,617	
40. Patronage Capital Beginning-of-Year	34,581,060	37,081,470	
41. Transfers to Patronage Capital	3,797,984	3,805,407	
42. Patronage Capital Credits Retired	1,297,574	1,625,202	
43. Patronage Capital End-of-Year (40+41-42)	37,081,470	39,262,675	
14. Annual Debt Service Payments	6,299,998	5,299,995	
45. Cash Retio [(14+20-10-11) / 7]	0.5326	0.5831	
16. Operating Accrual Ratio [(14+20+26) / 7]	0.8192	0.8653	
47. TIER [(31+26) / 26]	7.4327	8.3918	
48. DSCR [(31+26+10+11) / 44]	2,3624	2,6841	

#### USDA-RUS

# OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

BORROWER DESIGNATION

AK0509

PERIOD ENDED

INIGT	DUCTIONS - Day hala to the self-re-englishing	Decamber, 2013
1001	RUCTIONS – See help in the online application.	
	PART I - STATEMENT OF	
1.	Beginning Cash (Cash and Equivalents plus RUS Construction Fund)	10,136,37
_	CASH FLOWS FROM OPERATING ACTIV	
2.	Net Income	8,419,61
_	Adjustments to Reconcile Net Income to Net Cash Provided	
3.	Add: Depredation	4,666,83
4.	Add: Amortization	
5.	Other (Explain)	
	Changes In Operating Assets and Liebilit	
6.	Decrease/(Increase) In Accounts Receivable	2,182,99
7.	Decrease/(Increase) in Materials and Inventory	59,33
8.	Decrease/(Increase) in Prepayments and Deferred Charges	1,000
9.	Decrease/(Increase) in Other Current Assets	
10.	Increase/(Decrease) in Accounts Payable	(689,680)
11.	Increase/(Decrease) in Advance Billings & Payments	95
12.	Increase/(Decrease) in Other Current Liabilities	517,17
13.	Not Cash Provided/(Used) by Operations	15,158,23
	CASH FLOWS FROM FINANCING ACTIV	ITIES
14.	Decrease/(Increase) In Notes Receivable	246,60
15.	Increase/(Decrease) in Notes Payable	
16.	Increase/(Decrease) In Customer Deposits	(2,386
17.	Net Increase/(Decrease) In Long Term Debt (including Current Maturities)	(3,369,832
18.	Increase/(Decrease) in Other Liabilities & Deferred Credits	133,23
19,	Increase/(Decrease) In Capital Stock, Paid-in Capital, Membership and Capital Ce	rtificates & Other Capital 5,135,22
20.	Less: Payment of Dividends	
21.	Less: Patronage Capital Credits Retired	(1,625,202
22.	Other (Explain) Less Prior Year Affiliate Margins Included in Line 19	(5,135,229
23.	Net Cash Provided/(Used) by Financing Activities	(4,617,584
	CASH FLOWS FROM INVESTING ACTIV	TIES
24.	Net Capital Expenditures (Property, Plant & Equipment)	(1,762,657
25.	Other Long-Term Investments	(5,523,462
26.	Other Noncurrent Assets & Jurisdictional Differences	
27.	Other (Explain) Correct Line 24 for Plant Retired/Removal Costs/Salvage	(885,276
20.	Net Cash Provided/(Used) by Investing Activities	(6,171,395
29.	Net Increase/(Decrease) In Cash	2,369,25
30.	Ending Cash	12,505,629

Revision Date 2010





#### INDEPENDENT AUDITORS' REPORT

To the Board of Directors Copper Valley Telephone Cooperative, Inc. and Subsidiaries Valdez, Alaska

We have audited the accompanying consolidated financial statements of Copper Valley Telephone Cooperative, Inc. and Subsidiaries (the Cooperative), which comprise the consolidated balance sheets as of December 31, 2013 and 2012, and the related consolidated statements of operations, changes in members' equity, and cash flows for the years then ended, and the related notes to the financial statements.

## Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these consolidated financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of consolidated financial statements that are free from material misstatement, whether due to fraud or error.

## Auditor's Responsibility

Our responsibility is to express an opinion on these consolidated financial statements based on our audits. We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the consolidated financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the consolidated financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the consolidated financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the consolidated financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the consolidated financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

#### Opinion

In our opinion, the consolidated financial statements referred to above present fairly, in all material respects, the financial position of Copper Valley Telephone Cooperative, Inc. and Subsidiaries as of December 31, 2013 and 2012, and the results of its operations and cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America.

Report on Supplementary Information

Our audit was conducted for the purpose of forming an opinion on the consolidated financial statements as a whole. The consolidating statements are presented for purposes of additional analysis and are not a required part of the consolidated financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the consolidated financial statements. The consolidating information has been subjected to the auditing procedures applied in the audit of the consolidated financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the consolidated financial statements or to the financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the consolidating information is fairly stated in all material respects in relation to the consolidated financial statements as a whole.

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued a report dated April 15, 2014, on our consideration of Copper Valley Telephone Cooperative, Inc. and Subsidiaries' internal control over financial reporting and our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing and not to provide an opinion on the internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering Copper Valley Telephone Cooperative's internal control over financial reporting and compliance.

AKTLLP

Salem, Oregon April 15, 2014